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# Final General Management Plan and Environmental Impact Statement

## Volume 2: Comments and Responses on the Draft General Management Plan and Environmental Impact Statement

GETTYSBURG NATIONAL MILITARY PARK

June 1999

National Park Service
U.S. Department
of the Interior

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# Final General Management Plan and Environmental Impact Statement

Volume 2: Comments and Responses on the Draft GMP/EIS

# Gettysburg National Military Park

Gettysburg, Pennsylvania

June 1999

United States Department of the Interior • National Park Service

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# TABLE OF CONTENTS

## Comments and Responses


**FEDERAL AGENCIES** 1

Advisory Council on Historic Preservation 1
Chesapeake Bay Program, Scientific & Technical Advisory Committee 8
GNMP Advisory Commission 10
Industrial College of the Armed Forces, National Defense University 13
Senator Rick Santorum 16
Senator Arlen Specter 17
U. S. Department of the Interior, Fish and Wildlife Service 19
U.S. Department of the Interior, NPS, Manassas NBP 22
U.S. Department of the Interior, NPS, Vicksburg NMP 23
U.S. Environmental Protection Agency, Region III 25

**STATE AGENCIES** 28

Pennsylvania Department of Environmental Protection 28
Pennsylvania Fish and Boat Commission 30
Pennsylvania Historical and Museum Commission 32

**LOCAL AGENCIES** 36

Borough of Gettysburg 36
City of Fredericksburg, Virginia Senior Planner 48
Cumberland Township 49

**ORGANIZATIONS** 51

Animal Protection Institute 51
Association of Licensed Battlefield Guides 54
Civil War Round Table Associates 56
Concerned Citizens of Gettysburg[1] 57
Descendants of the NY 136th Infantry Regiment[2] 119
Evergreen Cemetery 126
Friends of the National Parks at Gettysburg, Inc. 128
Gettysburg Area Retail Merchants Association 130
Gettysburg Battlefield Preservation Association 135
Gettysburg Equestrian Historical Society 137
Gettysburg - Adams County Area Chamber of Commerce 138
Michigan Regimental Roundtable 139
National Capital Astronomers, Inc. 140
National Parks and Conservation Association 141
National Trust for Historic Preservation 146
Organization of American Historians 148
Plum Run Hunt 176
Preservation Pennsylvania 180
Sons of Confederate Veterans Camp #1616 and Military Order of the Stars and Bars Chapter #247 182
Strong Vincent Commemoratives Committee 183
Working Group at Gettysburg[3] 184
Wyoming Valley Civil War Round Table 186

**INDIVIDUALS** 187

Sandra & Harry Abramowski 187
M. N. Adams 188
Andrew Adler[4] 189
Arthur Aiken 190
An Adams County Resident 192
Jeffrey A. Anderson 193
Bob Angelovich 197
Charlotte Armster / Jerold Wikoff 198
Louise Arnold-Friend 199
Jeff Augustat 201
Angela M. Bailey 202
John C. Baker 204
John Baniszewski 205
Ulrike K. Baumann 206
Clifford K. Bebout III 207
Wayne E. Belt 208
Doniella Berry 211
Sarrisa Berry 212
Sharon A. Bertges 213
Donald R. Biffin 214
Hank Birdsell 215
Catherine D. Bishop 216
Rebecca Black 217
Steve Black 218
T. R. Blair 219
Margaret D. Blough[5] 222


[1] Included as appendices but not reproduced here were the comment letters from the Borough of Gettysburg, Cumberland Township, Gettysburg Area Retail Merchants Association, and Angela Rosensteel Eckert, which are printed elsewhere in this appendix; the Determination of Eligibility Notification for the Cyclorama Building, included with the comment letter from the Advisory Council on Historic Preservation; and the Plaintiff's Motion for Summary Judgement and the Memorandum in Support of the Plaintiff's Motion for Summary Judgement, Paul Davis III, et al, v. Latschar et al, Civ. No. 97-00232 (the Deer Lawsuit) which is available from the NPS.

[2] Included as an appendix but not reproduced here were photographs that are printed with the previous letter.

[3] Included as appendices but not reproduced here are the cover letter and the Public Meeting Schedule mailed with the Draft GMP/EIS.

[4] Identical letters were received from: Erica Adler; Michael Adler; R. Adler; Reeja Antony; Reeva Antony; Ressa Antony; Susan Antony; Ellen Baskin; Jeffrey Baskin; Rachel Baskin; E.A.Brown; W. Brown; Lee Carun; Ruth Carun; Warren Carun; Anthony D'Amato; Jo Ann Farley; Thomas Farley; Renee Giddings; Ronald Giddings; Wendy Giddings; Mohamed Hasham; Nizar Hasham; Raziya Hasham; Shane Hasham; Debby Hochstein; Joseph Klement; Alan Krieger; Suzanne Krieger; Pearl Maleus; Leah Peckerman; Mary Peckerman; Stanley Peckerman; Debbie Schictman; Karen Sunshine; and Kim Yonelunas.

[5] Included as an appendix, but not reproduced here are two newspaper articles.

William H. Boettcher 227
Gabor S. Boritt 228
Margaret M. Borock 230
William J. Bozic, Jr. 231
Sally D. Braman 232
Lee Van Brederode 233
Janet Breeding 234
Barry Brekford 235
Kenneth S. Bridgen 236
Lesley S. Bridges 238
Doug Bright 239
Ross Brightwell 240
Lucinda L. Bringman 241
Russell K. Broman 242
Carol G. Brown 244
D. E. Brown 245
Donald and Gloria Brown 246
James Brown 267
Mrs. John Brownlee 273
Sharon & Gerald Brummer 274
Thomas G. Bruner, Jr. 275
Timothy Buchanan 276
Grant A. Cadwallader 277
Norma L. Calhoun 279
James L. Cameron 284
Eric A. Campbell 285
Gordon Campbell 288
Brian Carey 289
Denise Carper 290
Mark & Barbara Chamberlain 292
Phyllis Chant 293
Debbee Clark 294
E. L. Clark 295
Joseph and Brenda Compher 296
Joseph J. Costello 297
George B. Crafort 298
Douglas R. Cubbison 299
Elizabeth Daniels 330
Richard D. Dasch 332
Paul D. Davis 333
Richard Davis 334
Robert Del Bianco 335
Dennis DeMots 336
Mr. and Mrs. J. L. Denison 337
Carl Dietrich 338
Marilyn Dinger 339
Dan J. DiOrio 340
Sharon L. Draper 341
Robert M. Dunkerly 343
Aaron E. Dunn 345
Robert E. Dunn, Jr. 348
Michael D. Dyas 349
Mrs. Tudor M. Ellis 352
William Tudor Ellis 353
William S. Eptic 354
EVEREW@aol.com 355
Michael Fay 356
David Feild 357
Linda Feltman 358
James Ferguson, Jr. 359
Barbara J. Finfrock 367
Steven A. Floyd 369
Roger H. Ford 370
John Frawley 371
Sophia P. Friedman 372
David O. Friend 373
Kathy Fronheiser 374
Robert E. Fullerton 375
Tim Fulmer 376
John M. Fuss 378
Marvin W. Gaskill 379
Richard A. Geidel 380
Reginald B. Gemmill 381
Pamela A. Gerlach 382
Paula Gidjines 384
Julius A. Giglio 385
Ingrid Gonzalez 386
Chip Goodrich 387
Hazel Gosney 388
Sandra E. Graham 389
Gerson Grosfeld 390
Alice Guthrie 391
David R. Gutknecht 392
James Hammel 393
Joan R. Hankey 394
Alex Harlett 395
Randy Harper 396
Dave Hawk 398
J. A. Hawkins 399
William R. Hawkins 400
Kurt Helmig 401
Robin E. Hemperly 403
Robin E. Hemperly 405
Rick Hendrickson 406
H. W. Henzel and A. K. Henzel 407
Howard E. Hillman 408
Frank G. Hills 409
Leonard I. Holder 410
Randy Holderfield 411
Kim B. Holien 415
Greg Hoover 422
William H. Horn 423
Rod Hoyt 424
Mr. & Mrs. W. Huenke 425
Thad Humphries 426
Ann Irving 427
Thor Iverson 428
Richard Janiszewski 429
Bill Johnson 430
Elaine and Bill Jones 432
James D. Jones 434
Todd Jones 435
Jenny Kasper 438
Michael Katz 440
Yvonne M. Keafer 441
Maxwell Keeler, Jr. 442
Letha Kempor 443
Alex M. Kessel 444
Samuel and Lisa Kibler 447
James A. Kilgore, Jr. 448
Jean King 449
Ward G. Kirkwood 450
Robert A. Kise[6] 451
Ruth Klement 452
Angela Klinger 454
Charles Knupsky, Jr. 456


[6] A similar postcard from the same author was not printed.

| | |
|---|---|
| James N. Kocur | 457 |
| Tom Kolarich | 458 |
| Daniel R. Kuehn | 459 |
| Michael C. Kulczycki | 463 |
| Barry E. Kunkel | 464 |
| Cinda Lagace | 467 |
| David A. Langbart | 468 |
| Paul Lango | 470 |
| Gary A. Larrison | 471 |
| Beth H. Lawrence[7] | 474 |
| Jane P. Leonard | 475 |
| Jane M. Linsky | 476 |
| Curt A. Livingston, Sr.[8] | 477 |
| Nancy C. Locher | 478 |
| William Longstreet | 480 |
| Wilson H. Lotz | 481 |
| Robert E. Lupp | 482 |
| James Lutz | 484 |
| Jean Lynch | 485 |
| Dennison S. Lyon | 486 |
| Robert A. MacAskill[9] | 487 |
| Lohrie G. MacDonald | 488 |
| Rosemary Maidusteck | 491 |
| Octavia Malinoski | 492 |
| Kathy Malowney | 493 |
| Pamela G. Martin | 494 |
| Pete A. Matijasick, II | 495 |
| Rosalind and Edward McLaughlin | 496 |
| Martha D. McMakin | 497 |
| Mary K. McNabb | 498 |
| Ron Meyer | 499 |
| Jerry Miller | 500 |
| Karin R. Miller | 503 |
| Walter Miller | 505 |
| John E. Moffat | 506 |
| Jackie Momener | 507 |
| Mike Monahan | 508 |
| Paul Moschette | 509 |
| Kenneth F. Mott | 510 |
| Hugh F. Mullen, Jr. | 511 |
| Don Mullis | 513 |
| John A. Murphy[10] | 514 |
| John R. Murphy | 526 |
| Umberto P. Mutt | 527 |
| Ermin D. Narehood | 528 |
| Patrick L. Naugle | 529 |
| Harold Nelson | 531 |
| Ruth Niswander | 542 |
| Bob Nordvall | 543 |
| Robert O'Callahan | 544 |
| owlpa1701 | 545 |
| Richard C. Palaski | 546 |
| Robert Paprocki | 547 |
| Michele Parisi | 548 |
| Michael & Margaret Parmer | 549 |
| William H. Pearson, Jr. | 550 |
| Edward J. Pekor | 551 |
| Faith C. Petric | 552 |
| Arlyn Pettingell-Miller | 553 |
| Barbara Platt | 554 |
| Loretta Pollack | 559 |
| Sal and Gail Prezioso | 560 |
| William C. Prinn | 563 |
| Gerald T. Provencher and family | 564 |
| Mr. & Mrs. L. Quirk | 565 |
| J. Rakes | 566 |
| Michael V. Redding | 567 |
| Myra R. Reichart | 570 |
| Carolyn Sue Reigle | 571 |
| William R. Reinhart | 572 |
| Benjamin Resnick | 573 |
| Conrad B. Richter | 574 |
| Virginia Ricker | 579 |
| Robert L. Ridgway | 581 |
| Donna E. Ristenbatt | 582 |
| H. Michael Roark | 584 |
| Ken and Dorothy Roberts | 585 |
| Michael and Peggy Robinson | 586 |
| William J. Romeo | 587 |
| Jeffrey R. Ross[11] | 588 |
| Chuck Rothlauf | 589 |
| C. K. Roulette | 590 |
| James S. Rouse | 593 |
| Tara E. Santmire | 595 |
| Anthony Sapia | 596 |
| Albert and Barbara Sarvey | 597 |
| Martin Sax | 598 |
| Robert Schafer | 599 |
| Fred L. Schaff[12] | 600 |
| Louis B. & Betty Scharon[13] | 601 |
| Gary Schneider | 602 |
| Kathie Schnibben | 603 |
| Gail S. Schrack | 604 |
| Dave Searles | 606 |
| David Sedlock | 607 |
| Debra Sellers | 608 |
| Jennifer Shaw | 609 |
| J. W. Shiner | 611 |
| Dean A. Shultz | 614 |
| Jeanette E. Sievers | 622 |
| Timothy Simpson | 623 |
| Cynthia R. Slagel | 624 |
| Rex L. Sluyter | 625 |
| Beth R. Smith | 626 |
| Seward J. Smith | 627 |
| Ken Snyder II | 629 |


[7] An identical letter from Lewis Lawrence was not printed.

[8] Included as an appendix but not reprinted here was the NPCA Park Watcher Flash of October 1998.

[9] Included as an appendix but not reproduced here were two newspaper articles.

[10] Included as appendices but not reproduced here were the Deer Lawsuit, excerpts from the Administrative History of Gettysburg NMP, July 1991 (pages 281 and 283); and Mr. Murphy's Memorandum and enclosures presented to the Advisory Council on Historic Preservation dated October 10, 1997 regarding the Deer Lawsuit.

[11] A nearly identical letter from the same author was not printed.

[12] Included as an appendix but not reproduced here was the Summary from the Draft GMP/EIS.

[13] An identical letter to Senator Craig Thomas was not printed.

Robert W. Soulen 631
Thomas Spavias 632
Matthew W. Steed 633
Harry B. Steinbach 635
Katie Stella 636
Thomas J. Stenhouse 637
Bill Stephens 638
James H. Stephens 643
Kenneth R. Stiles 644
John Page Nicholson Stull 645
Preston J. Sturdevant, Jr. 646
John E. Sullivan III 650
Harold P. Swanger 651
Jean Swartz 652
Paul R. Szymanowski 653
Tannery Bed & Breakfast Owner 654
Steve J. Taper 655
Andrew Taylor 656
Andrew Taylor 657
tcdhart 658
Andrea M. Theisson 659
Arnold G. Thibodeau 661
Robert C. Thomas 662
Susan G. Thomas 663
Fred Thompson 664
Gary Thompson 665
John A. Tillema 666
Teresina S. Toepke 667
Henry V. Trippe, Jr. 668
Henry V. & Wilma E. Trippe 669
Frank A. Troiani 670
Allan Tulp 671
Saul Eric Uberman[14] 672
Saul Eric Uberman 694
Jonathon Uhlig 698
Michael Vallona 699
E. Reginald Van Driest II 700
Douglas J. Veverka 701
Tom Vossler 703
Edith Wacksman 705
Bruce Walker 706
Philip J. Ward 707
James R. Warnke 708
Jeff Wasel 709
Mary E. Watson 710
Phyllis Marshall Watson 711
Portia L. Webster 712
Bruce Westcott 713
Joseph F. Wilburn 714
David A. Wilcox, Jr. 715
Mrs. William D. Wilkinson 716
W. David Williams 719
Donald C. Williams 720
Roger Willmann 721
Frank and Rebecca L. Wilson 723
Jim Wilson 724
Christopher Wolk 726
Lisa Wood 727
Bryan L. Wyberg 728
Violet Rosensteel Yount 729
David Zachau 730
John L. Zaremba 731
John C. Zimmer 732

**PUBLIC HEARING OF OCTOBER 1, 1998** **734**

Tom Wolf 738
Sal Prezioso 740
Linda Bugash 742
Gerald R. Bennett 743
John Fenstermacher[15] 745
Craig Caba 750
Chris Madrid 751
Philip Stewart 753
Elizabeth Daniels 754
Margaret Blough 757
Michael Lyons 758
Bill Stephens 760
Dan Hoffman 764
Roger Steele 765
Conrad Richter 766
Elaine Jones 767
William Jones 769
Hank Whitfield 770
Gene Albright 771
Michael McCloskey 773
Tammy Myers 775
Eric Uberman 778
Paul Witt 781
Betty Lee Frealing 782
Beverly Ann Stanton 784
Holly Giles 786
Bill Leonard 787
Robert Monahan, Jr. 788
Jean Swartz 790
Cathy McElroy 793
David Sites 794
Elwood Christ 797
Craig Stark 799
Emmett Patterson 802
David Radcliffe 805
Elise Scharf Fox 806
John Bostek 807
John Fenstermacher 810
Craig Caba 812
Margaret Blough 813
Gene Albright[16] 814
Eric Uberman 815
Paul Witt 816
Beverly Ann Stanton 817
Bill Leonard 819
Craig Stark 820
Emmett Patterson 822
Elise Scharf Fox 824
Walter Powell 825
Elizabeth Daniels 826
John Murphy 828
Elizabeth Daniels 831

[14] Included as appendices were Senator Arlen Spector's letter to Bruce Babbit dated August 3, 1998 which is included in this document; an appendix noting commercial establishments close to the park, reprinted with the comments of the Concerned Citizens of Gettysburg; and the Fall 1998 issue of the Friends of the National Parks at Gettysburg Newsletter.

[15] A written copy of these comments was not printed.

[16] A written copy of these comments was not printed.

Mr. Peterson 832
Beverly Ann Stanton 835

**PUBLIC HEARING OF OCTOBER 3, 1998 839**

Dennis Frankfort[17] 842
Larry Defuge[18] 845
Craig Caba 847
Joan Hankey[19] 849
Marge McConnell[20] 851
Margaret Counts 852
Vickey Monrean 853
Dennis Matthews 854
Barbara Finfrock[21] 857
Dean Shultz 860
Paul Witt 863
Tammy Myers 864
Sam Dayhoff 866
John Fitzpatrick 867
C. K. Roulette 869
John Murphy 871
Tom Vossler 873
Betty Lee Frealing 875
Craig Stark 876
Bill Leonard 878
Peter Monahan 880
Alex Kessel 881
Janet Coleman 884
Dick Peterson[22] 885
Eric Uberman 887
Mark Gruin 889
Wes Ayre 893
Bobbie Platt[23] 896
Alex Kessel[24] 900
Craig Stark 906
Dean Shultz 908
Craig Caba 910
Mark Gruin 911

**PETITIONS 916**

Concerned Citizens of Gettysburg[25] 916

[17] A written copy of these comments was not printed.

[18] A written copy of these comments was not printed.

[19] A written copy of these comments was not printed.

[20] A written copy of these comments was not printed.

[21] A written copy of these comments was not printed.

[22] A copy of the newspaper article referred to was provided but not reprinted.

[23] A copy of the newspaper article referred to was provided but not reprinted.

[24] A written copy of these comments was not printed.

[25] Included as appendices but not reprinted were copies of newspaper articles, pages of the Draft GMP/EIS, pages from various NPS policies, Main Street Gettysburg Minutes, and newsletters from various sources.

# COMMENTS AND RESPONSES ON THE DRAFT GENERAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

This second volume of the *Final General Management Plan / Environmental Impact Statement, Gettysburg National Military Park,* includes the comments received on the *Draft General Management Plan / Environmental Impact Statement.* These comments are being published to provide other organizations, agencies and interested parties with the opportunity to review all comments received by the National Park Service (NPS) during the public review period. The NPS responses for those comments are intended to help the public understand how NPS reviewed and responded to the comments received.

During the public comment period, NPS received approximately 507 written or oral hearing comments, including one petition with 26 signatures. All comments received were reviewed and considered by NPS in the preparation of this *Final General Management Plan / Environmental Impact Statement*, consistent with the requirements of 40 CFR 1503. Comment letters from all federal, state and local agencies, private organizations, and individuals (when not redundant) have been reproduced in this volume.

As defined in *NPS-12: NEPA Compliance Guideline*, comments are considered substantive when they:

(a) Question, with reasonable basis, the accuracy of the information in the EIS

(b) Question, with reasonable basis, the adequacy of the environmental analysis

(c) Present reasonable alternatives other than those presented in the EIS

(d) Cause changes or revisions in the proposal.

Substantive comments were addressed by means of written responses, and where appropriate the text of the *Final General Management Plan / Environmental Impact Statement* was revised. A revision that has been made is referenced in the response (for example, a response might note that the "Vegetation" section of the "Affected Environment" chapter has been revised to include updated information.)

Because of the volume of comments received, not all comment letters have been printed. However, a list of all organizations and individuals, as well as federal, state and local agencies, who commented on the *Draft General Management Plan / Environmental Impact Statement* is included in Volume 1. In a few cases, where there were multiple similar comments (often form letters) a representative sample letter has been printed, along with a response, where applicable, that would apply to all similar comments. Many commentors included appendices. Each appendix was printed only once. If the appendix was a copy of material already included in the *Draft* or *Final GMP/EIS*, it was not printed. Notes to the Table of Contents for this volume indicate those letters for which appendices were not printed.

In accordance with federal privacy requirements, addresses and telephone numbers of all individuals have been blocked out. All written comments submitted to the National Park Service are available for review at Gettysburg National Military Park, Gettysburg, Pennsylvania.

**Advisory Council On Historic Preservation**

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

OCT - 6 1998

John A. Latschar
Superintendent
Gettysburg National Military Park
National Park Service
Gettysburg, PA 17325

1 REF Referral Concerning Eligibility for National Register - Cyclorama Building;
Proposal to Construct Visitor Center and Museum; and
Draft General Management Plan
Gettysburg National Military Park, Gettysburg, Pennsylvania

Dear Dr. Latschar

Enclosed is a copy of the affirmative findings, dated September 24, 1998, from the Keeper of the National Register of Historic Places responding to the Council's referral on behalf of the Society of Architectural Historians, for a determination concerning the eligibility of the Cyclorama Building, for the National Register.

Your letter of March 25, 1998 invited the Council to participate in consultation regarding proposed demolition of the Cyclorama Building in the event it was determined eligible. We are pleased to participate in the consultation process. The documentation which accompanied your request, along with the information contained in your recently submitted draft General Management Plan (GMP), provides a basis for that consultation to proceed. In addition, we encourage you to identify members of the interested public who may wish to participate in the consultation process and provide them with information concerning the Keeper's determination, as well as its implications for Section 106 review.

a We understand that to some degree, the GMP weighs alternatives to demolition of the Cyclorama Building. However, because the GMP was developed prior to the information concerning the Keeper's determination, it does not consider this aspect of the building's significance nor subsequent loss of a National Register property. Therefore, we request that you provide additional documentation which specifically identifies and evaluates these adverse effects, along with alternatives that would avoid, minimize or mitigate adverse effects to the Cyclorama Building.

## Advisory Council on Historic Preservation

a In December 1995, NPS prepared a determination of eligibility for the Cyclorama Center designed by architect Richard Neutra. The NPS determination found that the building did not meet the criteria of exceptional significance necessary to be eligible for the National Register of Historic Places. This finding was concurred in by the Pennsylvania State Historic Preservation Officer in May 1996. Using this finding as a starting point, NPS developed the draft GMP/EIS proposal, which suggests, among other things, the relocation of the cyclorama painting to a gallery where NPS can better preserve it, the removal of the Cyclorama Center, and the rehabilitation of the park's cultural landscapes. In September 1998, after the issuance of the draft GMP/EIS, the Keeper of the National Register of Historic Places reversed this finding, and the building was declared eligible for listing on the National Register. In December 1998, NPS began consultations with the Advisory Council, the Pennsylvania State Historic Preservation Officer, and interested parties and individuals. The NPS prepared a Section 106 Case Report in accordance with the Advisory Council on Historic Preservation regulations (36 CFR Part 800.8). The Case Report and supporting materials were provided to the Advisory Council, the State Historic Preservation Officer, and all interested parties for a 30-day comment period. After considering the comments received from the interested parties, NPS revised Case Report and resubmitted it to the Advisory Council, the State Historic Preservation Officer, and the interested parties, for a second 30-day review period. Comments received from the interested parties, and NPS responses to those comments, were discussed during the April 20, 1999, public consultation meeting. Comments received during that meeting will be incorporated into a final Case Report. On May 14, 1998, the Advisory Council announced its support of the draft GMP/EIS proposed treatment for the park's cultural landscapes, the cyclorama painting, and the Cyclorama Building. Before undertaking these actions, NPS would consult with the Advisory Council and the Pennsylvania State Historic Preservation Officer to develop appropriate mitigation policies with regard to the removal of the Cyclorama Center.

## COMMENTS

As you know, the Council is in the process of reviewing the GMP pursuant to the 1995 Nationwide Programmatic Agreement. In light of the Keeper's determination, and given the interrelatedness of the GMP and the proposal to demolish the Cyclorama Building, it will be necessary to coordinate these reviews to the fullest possible extent.

b It is our understanding that you wish to develop a programmatic agreement for the GMP's implementation. We look forward to working with you and the Pennsylvania SHPO to develop such a document. It could serve as a specific park-wide approach to meeting the more general terms of the Nationwide PA, consistent with, and tailored to, the actions and goals contained in the GMP and could help streamline future Section 106 compliance.

We appreciate the considerable information you have provided throughout your planning process, and commend your staff for their excellent presentations at the recent briefing provided to staff of the Pennsylvania SHPO and the Council. We look forward to working with you to address the full range of Section 106 issues you have brought forward. If you have any questions or wish to discuss any aspect of these reviews, please contact Martha Catlin at (202) 606-8505.

Sincerely,

[redacted] Klima
[redacted]tor
Office of Planning and Review

Enclosure

## RESPONSES

b NPS would consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation to develop a programmatic agreement for the implementation of the *Final General Management Plan/ Environmental Impact Statement.*

**Advisory Council On Historic Preservation**

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

OCT - 6 1998

Richard Longstreth
American Studies Department
2108 G Street, NW
George Washington University
Washington, DC 20052

Dear Mr. Longstreth:

On September 24, 1998, the Council was forwarded a formal reply from Carol Shull, Keeper of the National Register of Historic Places, regarding your request to the Council on behalf of the Society of Architectural Historians, concerning the eligibility of the property known as the Cyclorama Building for listing on the National Register of Historic Places. We enclose a copy of the determination for your information.

We appreciate your interest in this matter. If we may be of further assistance, please contact Martha Catlin at (202) 606-8505.

Sincerely,

Don L. Klima
Director
Office of Planning and Review

Enclosure

It has been a white since we talked, but all is well.

# COMMENTS

# RESPONSES

United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W
Washington, D.C. 20240

IN REPLY REFER TO: 2280

To: Don L. Klima
Director, Office of Planning and Review
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Ave., NW #809
Washington, DC 20004

The Director of the National Park Service wishes to inform you of our determination pursuant to the National Historic Preservation Act, as amended, and Executive Order 11593 in response to your request for a determination of eligibility for inclusion in the National Register of Historic Places. Our determination appears on the enclosed material.

As you know, your request for our professional judgment constitutes a part of the Federal planning process. We urge that this information be integrated into the National Environmental Policy Act analysis and the analysis required under section 4(f) of the Department of Transportation Act, if this is a transportation project, to bring about the best possible program decisions.

This determination does not serve in any manner as a veto to uses of property, with or without Federal participation or assistance. The responsibility for program planning concerning properties eligible for the National Register lies with the agency or block grant recipient after the Advisory Council on Historic Preservation has had an opportunity to comment.

Attachment

**DETERMINATION OF ELIGIBILITY NOTIFICATION**

**National Register of Historic Places**
**National Park Service**

---

**Name of Property:** Cyclorama Building

**Location:** Gettysburg National Military Park **State:** Pennsylvania

**Request submitted by:** Advisory Council on Historic Preservation

**Date received:** 03/30/98 **Additional information received** 3/98 - 9/98

---

**Opinion of the State Historic Preservation Officer:**

__Eligible x Not Eligible __No Response __Need More Information

**Comments:**

**The Secretary of the Interior has determined that this property is:**

_X_ Eligible **Applicable criteria:** A C __Not Eligible

**Comments:**

See attached comments.

__Documentation Insufficient
(Please see accompanying sheet explaining additional materials required)

Carol D. Shull
Keeper of the National Register

Date. September 24, 1998

NARS-21

## COMMENTS

## RESPONSES

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places
National Park Service

Cyclorama Building
Gettysburg National Military Park, PENNSYLVANIA

The Cyclorama Building is eligible for the National Register of Historic Places for its exceptional historic and architectural significance under criteria A and C. Constructed in 1958 as part of the National Park Service's massive and influential Mission 66 program, the Cyclorama Building is one of only five of the newly conceived building type, the Visitor Center, designed for the National Park System by noted, world class architects.

The Mission 66 program, a nearly billion dollar, ten year master planning and construction effort, was an exceptionally important undertaking in the history of conservation and the architecture of the National Park System. Designed to meet dramatically increased park visitation following World War II, and to coincide with the 50th anniversary of the National Park Service in 1966, Mission 66 had a profound impact on the physical infrastructure of the National Parks. Envisioned as a bold and forward-looking initiative, Mission 66 adopted modernism as its creed.

Reflecting a much more visitor-oriented management operation, the Mission 66 program conceived an innovative new building type--the Visitor Center--to centralize the management of visitors and interpretation of park resources. Strategically placed at centers of primary interest in parks and functioning as the hub of interpretive programs, visitor centers were collaborative designs of architects, landscape architects and museum specialists. Often, this collaboration involved professionals both within and outside the Service. Of the approximately 100 Visitor Centers either built or converted from existing buildings (79 newly constructed, 21 refurbished) the National Park Service selected five parks to receive the services of acclaimed architects:

**Gettysburg Visitor Center (Cyclorama Building) at Gettysburg National Military Park**, Gettysburg, PA; Richard Neutra & Robert Alexander, Los Angeles, CA, architects, 1958.

Visitor Center, Wright Brothers National Memorial, Cape Hatteras National Seashore, Manteo, NC; Mitchell, Cunningham & Giurgola, architects, 1958. Listed in the National Register as a contributing resource in the Wright Brothers National Memorial nomination, 2/26/98.

**Quarry Visitor Center, Dinosaur National Monument**, vicinity of Jensen, UT; Anshen and Allen, San Francisco, CA, architects, 1956-57. Listed in the National Register as a component of the Dinosaur National Monument MRA, 12/19/86.

**Headquarters Building (Beaver Meadows Visitor Center/Administration Building), Rocky Mountain National Park**, Estes Park, CO; Taliesin Associated Architects, 1965-66. Listed in the National Register as a component of the Rocky Mountain Park Utility Area (Rocky Mountain National Park MRA) as of 3/18/82.

**Painted Desert Community (including the Visitor Center), Petrified Forest National (Monument) Park**, AZ; Richard Neutra & Robert Alexander, architects, 1959-61.

From his earlier work designing innovative International Style residences in California to his later commissions on major public buildings such as the Cyclorama Building, the U.S. Embassy in Karachi, Pakistan, and the Los Angeles Hall of Records, Neutra is recognized as a master architect of Modern design by scholars in numerous publications. The recipient of many design awards and citations, in 1977 Neutra was posthumously honored by the American Institute of Architects, which awarded him its Gold Medal for lifetime achievement.

While it is undebatable that Neutra has been highly and widely acclaimed for his earlier residential designs for some time, it is not unusual for the significance of his later work to be gaining attention with the passage of time. Scholars are now placing his later works too into the context of modern architecture of the period. As such, the Cyclorama Building is a rare example of Neutra's institutional design on the east coast and one of his very few Federal commissions. While not currently analyzed in detail in publications, it is one of a very few of his later works often mentioned or illustrated. Similarly, the evolving scholarship on the history and impact of the Mission 66 program on design in the parks clearly indicates the seminal importance of the visitor center as a building type and of the examples designed by master Modern architects mentioned above, including the Cyclorama Building.

stac

Scientific & Technical Advisory Committee
Chesapeake Bay Program

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U.S. Geological Survey, RBD

Stephen A. Bieter, Vice Chair
Virginia Polytechnic Institute

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Cindy Wyden-Gomez
University of District of Columbia

October 16, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Sir

The Scientific and Technical Advisory Committee (STAC) of the Chesapeake Bay Program was asked by the National Park Service to review and comment on the Draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park (GNMP). Due to the limited time available to us, it has not been possible for the entire membership of STAC to review the document. I offer these comments based on my own review, which I hope will be useful to you in considering alternatives with regard to their impact on the Chesapeake Bay ecosystem.

1. **Bay Program commitments** - The Agreement of Federal Agencies on Ecosystem Management in the Chesapeake Bay was signed by the Secretary of the Interior, the Assistant Secretary for Fish and Wildlife and Parks, and the Director of NPS in 1994. That agreement committed the agency to bringing all of its programs into the partnership for Chesapeake Bay ecosystem management.

The commitments relevant to GNMP include (a) habitat restoration through support for the Chesapeake Bay Program's Habitat Restoration Strategy, (b) reduction of nutrient loadings to the Bay through a variety of approaches, and (c) reduction of toxics loadings to the Bay. I understand that the Chesapeake Bay Program's Federal Agencies Committee conducted a site assessment at GNMP to provide advice on ways of minimizing nutrient loadings. It would be good to see those recommendations and actions based on them incorporated into the final General Management Plan.

a

The National Park Service (NPS) is commended for addressing environmental concerns as well as cultural ones in the draft. I note that the 1895 act establishing the military park at Gettysburg prohibited harm to trees, bushes, and shrubbery, felling or removing timber, or hunting. The reasons for those prohibitions might not be the same as those prevailing at the present time, but they do provide a statutory basis for environmental conservation in GNMP.

Staff support provided by the Chesapeake Research Consortium, Inc.
Headquarters: 645 Contees Wharf Road, Edgewater, Maryland 21037-0200
Voice: 301-261-4502 410-798-1283 / Fax: 410-798-0816
E-mail: crc@chesapeake.org
STAC Website: http://www.chesapeake.org/stac/home.html

## Chesapeake Bay Program, Scientific & Technical Advisory Committee

a The Federal Agencies Committee visited the park a number of years ago and discussed a variety of actions that the park could implement to help the Chesapeake Bay Program reach it goals. Many of these actions have been addressed in the draft GMP/EIS. For example, in the action alternatives, cattle would be removed from all wetlands and stream corridors to reduce soil compaction and nutrient loading (section 4.4.2). The park would also require the use of low- or no-till farming techniques to reduce soil erosion and would continue to require soil conservation plans (section 4.4.2). As the park develops the implementation plans for the different actions, it would continue to work closely with the Chesapeake Bay Program to incorporate these and any other recommendations into the final plans and actions.

b 2. Forest removal - Certain actions proposed under alternatives B, C, and D to achieve cultural resource objectives are at odds with the natural resource objectives identified above. Removal of forest is the most serious concern, given an estimate by the Chesapeake Bay Program that the Bay watershed has lost about 471,000 acres of forest lands between 1985 and 1995. Removal of up to 1,015 acres of mature woods (Alternative D), might represent a small loss in the context of the entire country, region, or state, but it is a significant portion in the context of GNMP. Table 1 of the draft (page 31) indicates a total area of 1,974 acres in woodlots and woodlands in 1993. In the discussion of management prescriptions common to all action alternatives (page 84), the draft states that managers would "Develop park natural resource management actions which comply with the goals of the Chesapeake Bay program to the extent possible while achieving the park's cultural resource management goals." My point is that preserving forest coverage is an important goal for the Chesapeake Bay Program, and that many of the cultural resource management goals can be achieved without removing the forest.

3. Agricultural practices - In the discussion of management prescriptions common to all action alternatives (page 85), the draft identifies a commendable management objective for the park's agricultural program: "to protect cultural and natural resources, and to encourage the preservation of grassland species." I encourage GNMP to implement the identified actions, including scheduling of mowing and haying, removal of wetland pastures, cessation of tile drain installation and maintenance, and limiting use of pesticides, under *any* alternative, including Alternative A (the no-action alternative). For the most part, these involve no added cost to NPS and they are beneficial to the Bay ecosystem.

Thank you for the opportunity to comment. Please let me know if you need clarification of Chesapeake Bay Program objectives or assistance in finding scientific or technical information related to that program.

Sincerely,

Richard L. Jachowski

Richard L. Jachowski, Chair
Scientific and Technical Advisory
Committee

b NPS understands that preserving forest coverage is an important goal for the Chesapeake Bay Program. At the same time, preserving the cultural landscape is part of the park's mission. NPS Management Guidelines (4:2) state that in cultural zones the management of natural resources will support cultural resource objectives and where compatible with cultural resource objectives, the policies for natural zones will be followed. NPS policy (NPS 77, 2:2) also states that "the purposes of vegetation management are as diverse as the National Park System itself, ranging from perpetuating natural processes in natural zones to conserving the historic values of cultural zones...." Vegetation management is defined as the maintenance, establishment, or restoration of target vegetation that meets a park's management objectives. This may include an objective to preserve a historic site at a point in time in which periodic intervention may be required to counteract natural successional processes (NPS 77, 2:5).

NPS surveys and professional experience suggests that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help the park meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the GMP, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff is frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff established that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

As the park moves into the implementation phase of the plan, Best Management Practices would be used in all aspects of the project. Careful attention would be paid to soil erosion, sedimentation, water quality, and stream bank stabilization. Riparian buffers would be established in accordance with the NPS Riparian Buffer Plan. All efforts would be made to make the implementation as environmentally sensitive as possible, yet still achieve the park's historic landscape goals.

## GNMP Advisory Commission

October 15, 1998

Subject: GNMP Advisory Commission Resolution on the Draft General Management (GMP) and Environmental Impact Statement

To: Dr. John Latschar Supt. GNMP
97 Taneytown Rd.
Gettysburg PA. 17325

The Gettysburg National Military Park Advisory Commission supports the concept for future development of the Gettysburg National Military Park (GNMP) as proposed under Alternative C in the pending "draft" General Management Plan(GMP).

We believe that Alternative C most effectively and realistically fulfills the congressional mandate for the National Park Service to preserve the park resources and to provide interpretation of the impact of events that took place at Gettysburg in 1863. It is our firm belief that the implementation of the components of Alternative C will result in a better educational experience for visitors, improve the stewardship of historical resources, place the battle within the greater context of the Civil War, and help ensure that Gettysburg will remain an important destination in the future for all citizens pursuing an understanding of our American heritage.

We support the plan to return the critical ground now occupied by the Visitor Center and Cyclorama buildings to an appearance approximating the 1863 landscape when and if appropriate approvals for demolition are realized. Since the Keeper of the National Register has determined that the Cyclorama Building is eligible for listing on the National Register, the National Park Service has entered into consultations with the Pennsylvania Historical and Museum Commission and the Advisory Council on Historic Preservation, in accordance with the procedures of Section 106 of the National Historic Preservation Act. Due to our avid interest in the future of the battlefield, we wish to be considered as interested parties in those consultations.

Furthermore, returning the farm lot definitions and field vegetation patterns to their approximate 1863 configuration within the major battle areas will vastly improve visitors' ability to visually comprehend how and why the battle evolved the way in which it did. The achievement of this rehabilitation, incorporating the area now occupied by the Visitor Center and Cyclorama complex, will realize the spirit of a goal which had its genesis in the creation, by a group of Gettysburg citizens, of the Gettysburg Battlefield Memorial Association in 1864.

1

# COMMENTS

We believe the use of a public/private partnership to build and operate a badly needed visitor center is appropriate in consideration of the reality that traditional public funding of such a facility will not be forthcoming. We are gratified with the opportunity for public input during the past months and endorse the implementation of the Visitor Center proposal as revised, utilizing the LeVan property site, under a partnership agreement with the Gettysburg National Battlefield Museum Foundation.

We respectfully submit some specific recommendations for inclusion and/or addition to the draft GMP.

a .Services are critical to the success of the visitor's experience at Gettysburg. The Visitor Center lobby should contain a prominent and proactive information center, perhaps a kiosk staffed by volunteers, to provide full information on available services, location, direction, etc. in the Borough and surrounding environs. Consultation /partnership with the Travel Bureau, the Chamber of Commerce, GRMA and the PA.Heritage Parks Program may be an effective means of developing and managing such an information facility.

b .Traffic conditions in Gettysburg and in the Gettysburg area will be an ongoing concern in the future to which battlefield visitation will not be the sole contributing factor. All traffic analysis and management decisions must include the local environs as well as park avenues. This is an area problem requiring cooperative solutions with the park as a major player. A cooperative planning/managing partnership needs to be established on a permanent, ongoing basis. We suggest that the exploration of such an initiative be included in the GMP.

c .The draft GMP calls for access to the Visitor Center to be located on the Baltimore Pike and the Taneytown Rd. We are concerned with any initiative to significantly increase park visitor usage of the Taneytown Rd. This road, south of the current Visitor Center, provides the unique appearance of a rural trace reflective of its 19th century appearance. Directing north and south traffic approaching the area along the route 15 bypass to access the Visitor Center on this road would severely diminish its unique, rural character. We urge that such traffic be directed to use the Baltimore Pike exit from route 15 as the primary access. Promotion of the Taneytown Rd. access can be reserved for congestion management contingencies.

2

# RESPONSES

a The NPS agrees that a full range of visitor information services and resources should be made available in the new museum complex. These suggestions would be kept in mind during design of the facility and negotiations with local partners for provision of information services.

b NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation studies for the Gettysburg area. The project would include all of the communities in the affected area of the park. The study would recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

c As you have noted, the museum complex would include access from both Baltimore Pike and from Taneytown Road. The analysis completed by the traffic consultant indicates that traffic would likely use both roads to enter or exit the museum complex. The current visitor centers are located on Taneytown Road, and NPS now directs all traffic from State Route 15 to use Taneytown Road. Under the action alternatives, traffic from the north would now be directed to use Baltimore Pike. Therefore, the traffic analysis suggests that the average daily volume on Taneytown Road would decrease over current conditions.

d Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the road. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new Visitor Center to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking

## COMMENTS

.The location of the Taneytown Rd. entrance avenue is not precisely identified in the GMP. We strongly urge that it not be sited to disturb Guinn's Woods or the Patterson farm.

d .We strongly suggest that a modest size, permanent, parking facility be placed within the present employee parking area, adjacent to the southern boundary of the National Cemetery. This would accommodate visitors wishing to visit the Cemetery venue (or the "High Water" area) without having to go to the Visitor Center for a shuttle or having to hike a long distance from same. Preserving visitor choices of what and how to visit the park's many venues must remain a high priority as long as circumstances will permit.

e .Restoration of the field to approximate the 1863 landscape setting can not really be finalized as long as the ominous visual intrusion of the National Tower exists. The removal of this tower is not adequately addressed in any of the alternatives proposed in the GMP. We urge that the GMP include the objective of ridding the battlefield of this visual intrusion.

f .Implementation of Alternative C will increase the pressure on local area infrastructure. Substantial Federal and State funds will be needed in order to sustain and enhance transportation and other community and visitor serving infrastructure at Gettysburg. A similar effort has been successful in the Independence Hall and Boston's Freedom Trail park areas. It is strongly recommended that the GMP/EIS address the need for a concentrated, integrated effort by Federal, State and municipal officials to commit the financial resources that will be necessary to create and maintain the essential infrastructure at Gettysburg.

g .The GMP should emphasize the intent to implement the clearing of existing woodland with the utmost care to minimize negative environmental effect. The ultimate decision on which trees to be removed should be done only in concert with the appropriate scientific advice from appropriate state and other agencies. The plan should emphasize a gradual implementation to permit natural adjustment in favor of a crash cutting program.

Gerald Bennett
Chairman

10-15-98
Date

3

## RESPONSES

provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

e It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it was not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, removal of the National Tower has been added to the Final GMP/EIS.

f As noted on p. 248 of the draft GMP/EIS, other potential (non-NPS) developments in the area have been announced. Cumulatively, these developments may increase the strain on the regional infrastructure, particularly the local and regional transportation network. The NPS would continue to plan and work cooperatively with local, state and federal agencies to meet future infrastructure needs.

g The General Management Plan (GMP) is a long-term planning document that will guide the park for the next 10-20 years. Following final approval of the GMP, implementation plans would be written for specific actions, such as the removal of non-historic vegetation. These implementation plans would include identifying best management practices to address such questions as how to remove the vegetation in the most environmentally sensitive manner, when to do the removal so as to minimize the impacts to wildlife, soil, and water quality, to establish a timetable for the removal, and how to maintain those areas once they have been cleared. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas.

October 16, 1998

MEMORANDUM FOR SUPERINTENDANT, GETTYSBURG NATIONAL MILITARY PARK

SUBJECT: Review and Comment: Draft General Management Plan (GMP) for Gettysburg National Military Park

1. In response to the call for comments delineated in the Gettysburg Draft General Mnagement Plan, the following comments and observations are provided

a. I applaud and supports the overarching goals established to preserve and protect the Gettysburg National Military Park as a national resource. The majority of the recommendations and proposed plans clearly provide much-needed and potentially effective solutions to the environmental and utilization issues identified in the master plan

b. The United States Military and the Gettysburg National Military Park have had a long and enduring relationship. Indeed the GNMP has long been a "virtual" classroom for student officers and non-commissioned officers studying the military art In this respect, I was somewhat surprised that this very special and time-honored relationship, dating back to the turn of the century, was not specifically acknowledged in the GMP. Plan. That said, I'm confident that the architects of this plan and those responsible for the critical decisions regarding the future of the GNMP indeed recognize and appreciate this most special relationship.

a c. I'm greatly concerned by the potential limitations that are implicit in the proposed Transportation Management System (TMS). The professional military education (PME) programs of the National Defense University, as well as those of other intermediate and senior military education institutions (e.g. the Army War College, the Defense Intelligence college, Marine Corps University, and others require a significant degree of flexibility and freedom of action in being able to tour and visit specific sites upon the battlefield proper. Each professional military institution has differing, yet very specific learning objectives that field studies at GNMP fulfill. Because of these different educational purposes and learning objectives, these institutions must have a high degree of flexibility and freedom of action in where they conduct their instruction, how long they remain on site and in the sequence of stops, all of which contribute directly to the effectiveness of the desired learning experience. The proposed TMS, while seemingly benign at the outset, suggests that a high degree of control and restriction on group movement and stops on the battlefield will eventually be realized. I strongly oppose this prohibition. Clearly, the educational purposes for which military PME institutions utilize the GNMP are vastly different and far more critical for military scholars



## Industrial College of the Armed Forces, National Defense University

**a** None of the transportation management measures proposed in the plan are expected to have an impact upon the continued use of the battlefield by the professional military education programs of the U.S. armed forces. The NPS would continue to work with the military educational institutions, as it has done in the past, to satisfy their access and educational needs.

| COMMENTS | RESPONSES |
|---|---|
| Page 2 | |
| a (cont.) and students than those of the occasional tourist. Moreover, because of the education, preparation and experience of the professors and instructors from PME institutions, there is a significantly reduced likelihood of environmental damage or inappropriate use of the battlefield and its physical attributes by staff and students of the collective PME institutions. In light of the foregoing arguments, I strongly urge against any measure -- including TMS restrictions -- which would constrain or reduce the flexibility and pedagogical freedom of action of professional military education institutions on the Gettysburg National Military Park.. | |
| 2. Thank you for your attention in this matter. I would welcomes the opportunity to discuss this issue with you in greater detail and stand ready to work with you to develop and implement such measures which would accrue to the mutual benefit of all interested parties. | |
| PAUL M SEVERANCE<br>Colonel, United States Army<br>Director, Military Strategy and Warfare Course<br>Industrial College of the Armed Forces<br>National Defense University | |

ICAF-MSL

MEMORANDUM FOR SUPERINTENDENT, GETTYSBURG NATIONAL MILITARY PARK

SUBJECT: Comments on the Draft General Management Plan (GMP) for Gettysburg National Military Park

1. The overall aim of the GMP is on the mark and I support it fully. Cutting to the heart of the portion which concerns me, I offer the following views regarding the impact of this plan on the use of the Gettysburg National Military Park (GNMP) by the various professional military educational institutions (e.g. National Defense University, Marine Corps University, the Army War College and others):

a. Traffic management at times of peak visitation is a problem which will increase. I agree it must be managed. From the military educational perspective, each college/school uses the GNMP in ways and times that meet its particular learning objectives. None of us want a traffic management approach that restricts military use and freedom of action in our movement around GNMP. We at ICAF (I'm sure other college as well) would offer to participate in the process to find a solution that satisfies all needs.

b. Visitation congestion tends to focus on several choke points; the worst of these is probably Little Round Top. There may be utility in restoring the observation tower I understand used to be on Big Round Top, together with vehicular access. That would provide an alternative viewing point of the southern end of the battlefield, including the same general view available at Little Round Top.

2. Thank you for attention in this manner; we look forward to maintaining the outstanding relationship we have enjoyed with GNMP and its leadership.

JAMES E. TOTH
Colonel USMC(Ret)
Chairman, Department of Military
Strategy and Logistics
Industrial College of the Armed Forces
National Defense University
Washington, D.C.

## Industrial College of the Armed Forces, National Defense University

**a** None of the measures proposed in the plan are expected to have an impact upon the continued educational use of the battlefield by the U.S. military forces. The NPS would welcome the cooperation of the military as we develop plans to implement these measures.

**b** The reconstruction of the towers is proposed for Alternative D. Although vehicular access to the summit of Big Round Top is problematic, an historic formal trail that followed the Union battle line up the northern slope of the hill would be re-established to encourage this use in that alternative.

# COMMENTS

RICK SANTORUM
PENNSYLVANIA

United States Senate

October 16, 1998

Mr. Robert Stanton
Director, National Park Service
1849 C Street, N.W.
Washington, DC 20240

Dear Director Stanton:

I am writing with regard to the General Management Plan (GMP) proposal for the Gettysburg National Military Park (GNMP).

The sixty-day public comment period for the GMP will culminate on Saturday, October 17. I understand that completion of the sixty-days begins a period for analysis and review of public comment. I encourage you to move forward with this process following completion of the current comment period.

Representatives of my staff have attended every workshop, public meeting, and public hearing held during this process. Nine forums have been offered to the public for informational briefings, comments, questions and answers. The early September meetings offered the opportunity for individuals to hear presentations on aspects of the GMP. Those meetings also offered the public time for questions and answers on a wide range of issues.

Two of the nine meetings were conducted as public hearings, which allowed the public to comment as part of the official GMP record. While the public had the opportunity to submit written statements on the GMP throughout the sixty-day period, the two meetings held in Gettysburg on October 1 and October 3 allowed the public to offer formal comment on the record. During those meetings, approximately seventy-seven comments and opinions were offered for inclusion in the GMP.

Upon completion of the public comment period, it is my understanding that a process will begin for review and analysis of the public comment and opinion. I encourage that process to move forward, giving full and fair evaluation of the formal comment submissions. In addition, I ask that any necessary and appropriate revisions be made to reflect the concerns and opinions expressed.

Thank you for your attention to this letter.

Sincerely,

Rick Santorum
United States Senate

WORLD WAR WEST

# RESPONSES

## Senator Rick Santorum

## Senator Arlen Specter

United States Senate

COMMITTEE ON VETERANS' AFFAIRS

WASHINGTON, DC 20510-6275

August 3, 1998

The Honorable Bruce Babbitt
Secretary of the Interior
U.S. Department of the Interior
Washington, DC 20240

Dear Bruce:

I am writing to request that you extend the public comment period for the Gettysburg Draft General Management Plan from 60 days to 120 days.

As you know, the decision by the National Park Service to enter into an agreement with a private developer to build a new visitors center and museum at Gettysburg National Military Park has generated much controversy. I have been following this issue closely, and have heard from several organizations which have expressed concern about the project, including the Gettysburg Borough Council, the Gettysburg Area Retail Merchant Association, and the Gettysburg Convention and Visitors Bureau. While a 60-day public comment period may be adequate for most general management plans, I believe that the controversy surrounding this unprecedented plan necessitates a longer public comment period.

In addition, I urge you to ensure that the residents of Gettysburg are given a full and fair opportunity to express their concerns about the project, either through public workshops or public hearings.

Gettysburg played a pivotal role in our nation's history, and I want to ensure that any actions taken are in the best interests of the park and the community. Therefore, I urge you to extend the public comment period by another 60 days to give the community, preservation groups, and Members of Congress sufficient time to review and comment on the project.

As always, thank you for your consideration of this request.

My best.

Sincerely,

Arlen Specter

AS:pjm

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

SEP 0 . 1998

9/8/98

D18(2605)

Honorable Arlen Specter
United States Senate
Washington, D.C. 20510

Dear Senator Specter:

Thank you for your letter of August 3, 1998, to Secretary Babbitt requesting an extension of the public comment period for Gettysburg National Military Park's (GMP) "Draft" General Management Plan/Environmental Impact Statement (GMP/EIS).

We have given this request careful consideration, and for the reasons outlined below, we consider a 60-day public review period to be sufficient and ample time for the concerned citizens from Gettysburg, the Commonwealth of Pennsylvania, and all across the Nation, to review and comment upon the Draft GMP/EIS.

The organizations cited in your letter, including the Borough of Gettysburg, the Gettysburg Area Retail Merchants, and the Gettysburg Convention and Visitors Bureau have all cited objections to the original proposal for a new Visitor Center/Museum complex at Gettysburg NMP. As you will recall, the Director of the National Park Service (NPS) announced in November 1997, that the original proposal had been selected for negotiations. Since that time, the park has held eight public meetings and two open houses, and released three newsletters to the 4,000 citizens (from every State in the Union) on its mailing list, to gather public comments and concerns regarding that original proposal. The NPS has considered the comments from all respondents, both local and national, in the negotiations leading towards a revised and substantially improved proposal.

On June 18, 1998, this substantially revised proposal was released to the media and briefings were held with members of Congress, including a representative of your staff. During the following weeks, Gettysburg NMP's staff held meetings with each of the above groups, to brief them on the contents of the revised proposal. It is important to note that the formal resolutions forwarded to you were all produced before the NPS finished its negotiations and released the details of the revised proposal on June 18. The resolution of the Retail Merchants was approved May 27; the resolutions of the Gettysburg Borough was approved on June 4, and that of the Visitor and Convention Bureau on June 9, all before the NPS had the opportunity to brief these groups on the revised proposal.

We are confident that the revised proposal, and particularly the reduction in commercial services to be offered in the new complex, has done much to alleviate the legitimate concerns of those groups. Consequently, we are anxious to release the Draft GMP/EIS, which contains complete descriptions of the revised proposal, as well as its environmental and economic impacts. Again, we are confident that the beneficial economic impacts of the revised proposal - which predicts a 20 percent increase in visitor spending in the Gettysburg/Adams County economy - will be a welcome boost to the economic strength of both enterprising merchants and the Borough of Gettysburg.

For over 3 years, the NPS has discussed the concepts and issues of a proposed new Visitor Center and Museum Complex with the citizens of Gettysburg. Since April 1995, when this concept was first discussed in a public forum, the NPS has conducted 24 public meetings and open houses for the benefit of local citizens. In addition, we plan three more public meetings and open houses during the proposed

Honorable Arlen Specter 2

60-day public review period for the Draft GMP/EIS. Enclosed is a list of all the opportunities for public comment which have been afforded the public over the past 3 years.

If public comments received during the planned review period indicate that it would be in the best interest of the NPS to extend it, we would be pleased to revisit this decision at that time.

Thank you for your interest in Gettysburg NMP and the NPS.

Sincerely,

(sgd) Donald J. Barry

Assistant Secretary for Fish
and Wildlife and Parks

Enclosure(s)

bcc: 1416-Secy RF(2) 3152-FW 7221-ES 6248-OCL R/D-NER Supt.- GETT A/D-2500
0120-KRoberts CSasciuti-NER 0001-RF LStowe-2605)
FNP:Dr. JLatscher:717/334-1124:LES:ES#209244/APC# 98-02574:8/12/98:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

September 1, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar:

This responds to your August 14, 1998, letter requesting Fish and Wildlife Service review and comments of the Draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park. These comments provide technical assistance only, and do not represent the views of the Department of the Interior on the draft environmental impact statement.

Page V of the Summary indicates that two acres of wetlands would be affected by the build alternatives. Our October 10, 1997, letter on the proposed restoration of the battlefield had recommended that any wetlands potentially affected by the proposed action be assessed for their suitability as habitat for the federally-listed threatened bog turtle (*Clemmys muhlenbergii*), and that potentially suitable wetlands be surveyed by a qualified biologist using Service-approved techniques to establish the presence or absence of bog turtles. Page 177 of the impact statement indicates that a bog turtle survey of all wetlands within the park will be completed in the next two years. However, it is not clear from the impact statement when construction activities would begin on the battlefield restoration. Since activities in wetlands will require federal and State permits, it will be necessary to at least complete the bog turtle surveys on any wetlands affected by the proposed action prior to construction. This commitment to survey all potentially affected wetlands prior to construction should be made clear in the final environmental impact statement. a

Section 3.2.7 on wetlands indicates that there are 83,000 feet of drainage tiles within the National Park which have effectively drained most of the historic wetlands that were present during the Battle of Gettysburg. Should you elect to restore any of these former wetlands, my staff is available to assist such work. Please contact David Putnam of this office if you would like assistance with any wetland restoration efforts.

## U. S. Department of the Interior, Fish and Wildlife Service

a No construction activities or landscape restoration efforts would be initiated until each site has been surveyed for bog turtles and their potential habitats or until the park-wide bog turtle survey has been completed. A survey for bog turtles was completed by The Nature Conservancy during the spring and summer of 1998 on the Fantasyland/Quinn Woods site and the Levan Site where the proposed museum complex would be located. No suitable bog turtle habitat or bog turtles were found on either site (TNC 1998). The results of these surveys were forwarded to your office. On 11/6/98, you confirmed to NPS that since there was no suitable habitat for bog turtles at the Levan site, construction there would be unlikely to affect habitat for this species.

| COMMENTS | RESPONSES |
| --- | --- |
| If you have any questions regarding endangered species, please contact Michael McCarthy of this office at 814-234-4090.<br><br>Sincerely,<br><br>David Densmore<br>Supervisor | |

2

## U. S. Department of the Interior, Fish and Wildlife Service

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

November 6, 1998

Dr. John A. Latschar, Superintendent
U.S. Department of the Interior
National Park Service
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar:

The Fish and Wildlife Service has reviewed copies of LSC Design, Inc.'s wetland delineation report for the proposed Gettysburg Visitors Center, and The Nature Conservancy's (TNC) June 29, 1998, surveys for bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. This work has been conducted in wetland areas on the 45.7-acre Levan Tract, located adjacent to the Gettysburg National Military Park, in Cumberland Township, Adams County, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species.

In response to our October 17, 1997, request, a survey for bog turtle habitat within the project area was conducted by TNC biologists on April 24, May 22, and June 16, 1998. Based on our review of the color photographs taken at the proposed project area, along with the descriptions of soils and hydrology at each location, the Service has determined that none of the wetland areas affected by the construction of the proposed facilities have the organic soil horizons, mucky substrate, year-round spring-fed hydrology, nor suitable vegetation (for basking, nesting or hibernating/aestivating) with which the bog turtle is typically associated. Therefore, construction of the proposed visitor center and parking lots is not likely to affect habitat for this species.

If this project is implemented as proposed, along with erosion and sedimentation controls, the Service concurs that construction of the proposed visitor center facilities is not likely to adversely affect any federally listed or proposed listed species or their habitats. This response relates only to endangered or threatened species under our jurisdiction based on an office review of the proposed project's location. No field inspection of the project area has been conducted by this office. Consequently, this letter is not to be construed as addressing potential Service concerns under the Fish and Wildlife Coordination Act or other authorities.

If we can be of further assistance, please contact Michael McCarthy of my staff at 814-234-4090.

Sincerely,

David Densmore
Supervisor

## COMMENTS

United States Department of the Interior

NATIONAL PARK SERVICE
Manassas National Battlefield Park
12521 Lee Highway
Manassas, VA 20109-2005

IN REPLY REFER TO:

October 6, 1998

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

I have read, with great interest, the *Draft General Management Plan and Environmental Impact Statement* (GMP) for Gettysburg National Military Park.

I was immediately impressed with the analysis of the many issues with which you are faced, and the proposed solutions. Your analysis is thorough and clearly has made every effort to fulfill your mission of protecting your resources, while at the same time providing for the enjoyment of your visitors. You also have recognized the realities of budgetary constraints by seeking to develop a public/private partnership to solve the most immediate problem of inadequate and inappropriately sited visitor and storage facilities.

Beyond the immediate needs of relocating these facilities and thus restoring the "sacred ground" of Gettysburg, you have gone much further in developing a comprehensive plan for the future of the remainder of the park. My reading of the document demonstrates that you have shown great sensitivity not only to the areas where the most intense fighting took place, but also to the commemorative period, in which the nation sought to heal itself with the many monuments and preservation efforts.

Whichever of the action alternatives you select, your park will have a very thoughtfully prepared roadmap for future development and restoration efforts. I applaud your efforts.

Sincerely,

Robert K. Sutton

Robert K. Sutton, Ph.D
Superintendent

## RESPONSES

### U.S. Department of the Interior, NPS, Manassas NBP

United States Department of the Interior

NATIONAL PARK SERVICE

Vicksburg National Military Park
3201 Clay Street
Vicksburg, Mississippi 39180

L76(VICK-S)

September 16, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Rd.
Gettysburg, PA 17325

Dear John:

Thank you for the opportunity to review and comment upon the Draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park.

Having closely followed your efforts thus far, I commend you and the planning team on the methodical process used to produce this document, the results of which will help meet the dual mission of the National Park Service to protect our national treasures while providing for the benefit and enjoyment of the people. By inviting public participation throughout the course of this process, you have demonstrated a strong commitment to service and dedication to stewardship. Please accept my best wishes for your continued success as the next stage of the process unfolds.

Vicksburg is faced by many similar issues and is attempting to deal with those issues in much the same fashion that you are at Gettysburg. We too, for example, are attempting to identify and restore key landscape features to provide visitors with a better understanding of the battle action and enhance our management of these resources. Over the past eighteen months, we have cleared twenty acres of trees in order to reveal original trenches, clear fields of fire and approach as they were during the Siege of Vicksburg, and to expose thirty monuments, markers, tablets, and plaques which even frequent users of the park did not know exist.

It is essential to our interpretive presentation of battlefields such as at Vicksburg and Gettysburg to provide visitors with as similar a view of terrain, vegetation, structures, and other features as that experienced by the soldiers in blue and gray. Only then can we truly understand the tactical operations of the battle and the command decision process as they relate to both the army high command as well as the individual soldier. This also helps us to better understand the effects of the battle on the citizens whose lives and livelihood were impacted by the conflict. Thus, we

## U.S. Department of the Interior, NPS, Vicksburg NMP

**a** There are three nationally significant historic landscapes at Gettysburg: the battlefield, the Soldiers' National Cemetery, and the commemorative landscape that was the creation of the battle veterans. The battle commemoration has a long and significant history at Gettysburg. Private memorialization of certain portions of the battlefield had already occurred in the three decades after the battle. As a result of concerted efforts by Civil War veterans who wanted the site to be controlled by the national government, Gettysburg's battlefield did not remain in the hands of any private or state-sponsored organization. In 1895, Congress established Gettysburg National Military Park in response to both veteran and public demand. It was the intent of the United States Congress, and the battle veterans, that the battlefield be made into a "park" with park-like features.

The creation of the national military park formalized earlier efforts and set in motion a series of alterations to portions of the battlefield that would fulfill the desire of many Civil War veterans for a suitable monument to their past deeds. All major veteran societies and organizations hailed the transformation of the battlefield into a park. This transformation was manifested by the construction of avenues and observation towers, the erection of fencing to enclose the avenues, lawns and monuments, and the completion of marking of positions—all items defined as its most significant activities in the park's reports to Congress. General Daniel Sickles, who was the single most important sponsor and visionary of the national park bill for Gettysburg, publicly stated in 1894 that he was working with the battlefield commission on the "artistic and patriotic effects" of the park's design. According to General Sickles, these designs for the park would give "added glory and significance" to the Gettysburg battlefield, a judgment which was ultimately endorsed by both Union and Confederate veterans (UCV, GAR, Society of the Army of the Potomac).

Testimony before Congress by the army's judge advocate general in 1902, revealed that it was not the intent of Congress or the War Department to transform all battlefields into "great military parks." Gettysburg was to be the great park of the Eastern Theater and Chickamauga was to fill the same role for the Western Theater of the war. Other sites, such as Antietam and Stones River, were recommended for minimal expenditure beyond the preservation of the battle terrain and the provision of minimal accessibility (i.e., the "Antietam Plan"). It was, however, the intent of Congress and the

## COMMENTS

support the management prescriptions outlined in Alternative C of the draft plan as the most viable option to promote more thorough interpretation and ensure long-term preservation of the historic resources entrusted to the care of the National Park Service at Gettysburg.

a However, one aspect of Alternative C does not seem in keeping with the philosophy of the management prescription outlined in Alternative C--namely that "The features that are significant to the design of the commemorative park built by veterans between 1895 and 1927 are repaired, rehabilitated, restored or reconstructed." Such action is not in keeping with either the park's enabling legislation or the Act of the General Assembly of Pennsylvania through which The Gettysburg Battlefield Memorial Association was incorporated. These post-war accretions would only hinder the fulfillment of the objectives outlined in Alternative C, mar the historic landscape of the battlefield, and prevent visitors from gaining the desired level of understanding of the events which transpired at Gettysburg on July 1-3, 1863. Any effort to layer the commemorative area would only stand to confuse the visitor and complicate management of the resource.

Again, please accept my best wishes for the successful completion of this process and implementation of its recommendations. Please let us know if we can be of assistance.

Sincerely,

Bill

William O. Nichols
Superintendent

## RESPONSES

War Department to create a park at Gettysburg where battle landscape and commemorative landscape co-existed and complemented each other in a way that elevated both the physical appearance and the perceived significance of the historic site itself. Reintroduction of significant features of the commemorative park in GMP alternatives is needed to allow NPS to interpret this part of the Gettysburg story.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

OCT 0 9 1998

Dr John A. Latschar
Superintendent
United States Department of Interior
National Park Service
Gettysburg National Military Park
Gettysburg, Pennsylvania 17325

RE: Draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park (DES-88-34)

Dear Dr. Latschar:

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), and Section 309 of the Clean Air, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced proposal.

Based on our review of the DEIS, EPA has rated the environmental impacts of the action as "EC" Environmental Concerns and the adequacy of the impact statement as "2" Insufficient Information. A copy of EPA's rating system is enclosed for your reference. The detailed basis for these ratings are contained in the following comments

**Project Description**

The management of Gettysburg National Military Park proposes to rehabilitate and re-institute the pattern of open fields and wooded areas present in 1863 in the Major Battle Action Area, managing contemporary agricultural uses to protect landscape and historic resources. This proposed project would move most park facilities, including the Visitor Center and Cyclorama, to sites outside the Major Battle Action Area, enabling rehabilitation of the battle landscape at the sites of these facilities. New park facilities, including the Visitor Center, would provide necessary services with minimum impact to the historic landscape

**Environmental Concerns/Insufficient information**

a EPA is concerned with the potential encroachment of the proposed build alternatives on aquatic resources, including non-tidal wetlands. The Draft EIS indicates that two acres of wetlands would be adversely affected by the three build alternatives. All three of the build alternatives would have permanent effects on wetlands. Every effort to avoid and mitigate for

*Customer Service Hotline: 1-800-438-2474*

## U.S. Environmental Protection Agency Region III

a The NPS agrees that every effort must be made to protect all wetlands. The draft GMP/EIS states there may be up to 2 acres of wetlands affected by the construction of the proposed museum facilities (section 4.4.2). Wetland delineation has already been completed on the proposed build site and the extent of the impacts cannot be further evaluated until the building design is completed. However, the NPS would protect wetlands wherever possible. Where wetlands may be impacted, the NPS would either mitigate the effects of the impacts or restore wetlands in areas that have been drained in the past. In the NPS's recently revised wetlands policy (Director's Order. 77-1) it states the goal for the NPS is "no net loss of wetlands." This information was transmitted to the public during the extensive series of public workshops held for the draft GMP/EIS.

## COMMENTS

the permanent and temporary effects to the aquatic resources need to be thoroughly investigated and documented.

b The wetland systems on the entire battlefield site may have the potential to be bog turtle (Clemmys muhlenbergii) habitat. These potential habitat areas should be surveyed for the entire two years as mentioned in the draft EIS. A qualified biologist from the U.S. Fish and Wildlife Service should confirm that the proposed project will not adversely affect potential bog turtle habitat once the survey is complete. Page 177 of the draft EIS indicates that the survey will be complete in two years. Yet, it is not clear when construction activities are proposed to start. The final EIS should clearly state that the project will not affect bog turtle habitat when construction activities are proposed to begin.

c Additional information on alternative ways to avoid or reduce wetland impacts should be explored and documented to ensure the least damaging practicable alternative is selected. EPA would like to see further documentation regarding the restoration of 100 acres of wetlands mentioned in the draft EIS. The final document should include detailed descriptions of the restoration of these wetlands including grade plans, sources of hydrology, native plants to be reestablished in the restored wetlands and a long-term monitoring plan. EPA would like to be involved in the coordination of this plan.

Thank you for the opportunity to comment on this project. If you have any further questions, please contact Ralph Spagnolo of my staff at (215) 814-2703.

Sincerely,

William J. Hoffman, Program Manager
NEPA/Section 404 Regulatory Program

Enclosure

## RESPONSES

b No construction activities or landscape restoration efforts would be initiated until each site has be surveyed for bog turtles and their potential habitats or until the park-wide bog turtle survey has been completed. A survey for bog turtles was competed by The Nature Conservancy during the spring and summer of 1998 on the Fantasyland/Quinn Woods site and the Levan Site where the proposed museum complex would be located. No suitable bog turtle habitat or bog turtles were found on either site (TNC 1998). On 11/6/98, the U.S. Fish and Wildlife Service concurred that there was no suitable habitat for bog turtles at the Levan site, so construction there would be unlikely to affect habitat for this species.

c Further documentation regarding the restoration of the wetlands noted in the draft GMP/EIS would be prepared as a part of the implementation of the final, approved NPS plan. GMPs outline the broad goals for the park and provide a framework for future management. Therefore, they do not generally include the specific, detailed plans you reference. NPS would welcome the assistance of EPA and the U.S. Fish and Wildlife Service to ensure that adequate restoration plans are developed.

**SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION***

**Environmental Impact of the Action**

**LO–Lack of Objections**
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC–Environmental Concerns**
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

**EO–Environmental Objections**
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU–Environmentally Unsatisfactory**
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

**Adequacy of the Impact Statement**

**Category 1–Adequate**
The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2–Insufficient Information**
The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**Category 3–Inadequate**
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

## COMMENTS

Pennsylvania Department of Environmental Protection

**PLEASE NOTE NEW ADDRESS AND TELEPHONE**
**909 Elmerton Avenue**
**Harrisburg, PA 17110-8200**
September 4, 1998

**Southcentral Regional Office**

717-705-4703
FAX 717-705-4930

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Mr. Latschar,

The Pennsylvania Department of Environmental Protection has reviewed the information provided regarding the proposed alterations to the Gettysburg National Military Park in Adams County.

The proposed project, to the best of our knowledge, will have no adverse effect on the environment

Before proceeding with this project, please consider the following comments:

a

- Act 537 sewage planning may be required. Please contact Mr. Mike McNulty of the Water Management Program at our Chambersburg District Office, 1331 S. 7th Street, Suite 6, Chambersburg, PA 17201-3851 or telephone 717-267-3364 for additional information.
- A Soils and Waterways Water Obstruction and Encroachment permit will be required for this project. Please contact the Adams County Conservation District Office for additional information.
- NPDES Part I and Part II permits may be required. Please contact Ms. Lisa Sweigert of the Water Management Program at the above address or telephone 717-705-4814 for additional information.
- Please be advised that there may be drinking water supply issues concerning water quantity. You should contact the Gettysburg Municipal Authority to discuss this matter.

Thank you for the opportunity to provide comments on this project.

Sincerely,

Karen Bassett

Karen Bassett
Assistant Regional Director

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## RESPONSES

### Pennsylvania Department of Environmental Protection

a The Gettysburg National Battlefield Museum Foundation would apply for all required permits and permissions necessary for the construction of the proposed facility. No construction would be undertaken until all required permits have been issued.

## Pennsylvania Department of Environmental Protection

Pennsylvania Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110-8200
December 17, 1998

Southcentral Regional Office
717-705-4702
FAX - 717-705-4830

Dr John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Re: General Management Plan
Gettysburg National Military Park

Dear Dr Latscher

I have reviewed the General Management Plan for Gettysburg National Military Park as it applies to air quality issues. The Department's responsibilities and the area's ambient air quality status are accurately represented in Chapter 1, section 1 7 6 entitled "Impacts Topics Eliminated from Future Evaluation."

This section correctly points out that ambient air quality, particularly for ozone in the Northeast Corridor is a regional rather than a local issue. The park's ability to influence atmospheric ozone concentrations is indeed limited to the management of vehicular traffic within the park

Sincerely,

Leif Ericson
Regional Manager
Air Quality

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## COMMENTS

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
450 Robinson Lane
Bellefonte, PA 16823-9620
(814) 359-5147

January 11, 1999

Dr. John A. Latschar, Superintendent
United States Department of the Interior
National Park Service
Gettysburg National Military Park
Gettysburg, PA 17325

Re: Gettysburg National Military Park
Draft General Management Plan and Environmental Impact Statement

Dear Dr. Latschar:

Reference is made to the subject document that was forwarded to our agency for review and comment. The preferred plan (Alternative C) proposes to relocate buildings, incorporate small scale landscape elements, and remove forested vegetation to simulate existing conditions that were present at the time of the Battle.

Rock Creek and several of its tributary streams are the drainage areas within the National Park. None of these streams support wild trout populations nor are approved stocked trout streams by the Pennsylvania Fish and Boat Commission (PFBC). The *Protected Use* for aquatic life assigned to the Rock Creek basin is *Warm Water Fishes* (WWF) as listed within Chapter 93 of Title 25 Pennsylvania Code. The limited amount of biological data we have collected from these waterways suggests the presence of warmwater fish communities and therefore supports the WWF water quality designation.

Portions of these watersheds will be deforested under the preferred plan. We do not believe the removal of riparian trees along these streams will change the fish communities. We do however, believe impacts to aquatic communities will occur if streambeds were physically altered and left exposed to erosion and sedimentation. Therefore, we strongly encourage the National Park Service to carefully remove mature trees within the riparian stream corridors and maintain at
a least a 35 foot vegetative (ie. small trees, shrubs, grasses) buffer on each side of the waterway. The maintenance of this vegetative buffer will insure bank stability and the protection of the aquatic resources from impacts associated with erosion and sedimentation.

## RESPONSES

### Pennsylvania Fish and Boat Commission

a As noted in the action alternatives to the draft GMP/EIS, best management practices would be used for all aspects of tree removal. Careful attention would be paid to soil erosion, sedimentation, water quality, stream bank stabilization, and ripiarian buffers (Dewalle 1998). Riparian buffers would be established in accordance with the NPS Chesapeake Bay Riparian Buffer Plan (1998), which calls for a minimum of a 35-foot vegetative buffer on both sides of a stream corridor. All efforts would be made to make the implementation as environmentally sensitive as possible, yet still achieve the park's historic landscape goals.

Dr. John A. Latschar
January 11, 1999
Page 2

In summary, the PFBC has no objections towards Alternative C as long as protective measures are adopted within the plan to maintain existing aquatic resources. Thank you for providing us the opportunity to comment on this important Park proposal and please feel free to contact my office if we can be of any further assistance.

Sincerely,

John A. Arway, Fisheries Biologist
Division of Environmental Services

JAA:srh

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

Executive Director

October 16, 1998

United States Department of the Interior
National Park service
Gettysburg National Military Park
Attn: John A. Latschar, Superintendent
Gettysburg, PA 17325

Re: Draft General Management Plan for Gettysburg National Military Park & Eisenhower National Historic Site, Adams County

Dear Mr. Latschar.

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above referenced plan in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. et seq. (1988) Our comments are as follows:

Please consider this to be the State Historic Preservation Office's response to your request for consultation in the matter of this General Management Plan. We concur with the preferred alternative, Alternative C, for the following reasons:

1. Alternative C balances the cost of total restoration of the landscape against the visitor experience. The selective restoration of the historic woodlands, woodlots, orchards, and fencelines is appropriate.

a Because the Keeper of the National Register of Historic Places has determined that the Cyclorama Building is eligible for listing, we presume that an effects report will be prepared, since the removal of the building constitutes an adverse effect. Please forward this report so that the consultation process with our office and the Advisory Council may proceed.

## Pennsylvania Historical and Museum Commission

a In December 1995, NPS prepared a determination of eligibility for the Cyclorama Center designed by architect Richard Neutra. The NPS determination found that the building did not meet the criteria of exceptional significance necessary to be eligible for the National Register of Historic Places. This finding was concurred in by the Pennsylvania State Historic Preservation Officer in May 1996. Using this finding as a starting point, NPS developed the draft GMP/EIS proposal, which suggests, among other things, the relocation of the cyclorama painting to a gallery where NPS can better preserve it, the removal of the Cyclorama Center, and the rehabilitation of the park's cultural landscapes. In September 1998, after the issuance of the draft GMP/EIS, the Keeper of the National Register of Historic Places reversed this finding, and the building was declared eligible for listing on the National Register. In December 1998, NPS began consultations with the Advisory Council, the Pennsylvania State Historic Preservation Officer, and interested parties and individuals. The NPS prepared a Section 106 Case Report in accordance with the Advisory Council on Historic Preservation regulations (36 CFR Part 800.8). The Case Report and supporting materials were provided to the Advisory Council, the State Historic Preservation Officer, and all interested parties for a 30-day comment period. After considering the comments received from the interested parties, NPS revised Case Report and resubmitted it to the Advisory Council, the State Historic Preservation Officer, and the interested parties, for a second 30-day review period. Comments received from the interested parties, and NPS responses to those comments, were discussed during the April 20, 1999, public consultation meeting. Comments received during that meeting will be incorporated into a final Case Report. On May 14, 1998, the Advisory Council announced its support of the draft GMP/EIS proposed treatment for the park's cultural landscapes, the cyclorama painting, and the Cyclorama Building. Before undertaking these actions, NPS would consult with the Advisory Council and the Pennsylvania State Historic Preservation Officer to develop appropriate mitigation policies with regard to the removal of the Cyclorama Center.

## COMMENTS

Page2
October 16, 1998
John Latscher

2. The visitor experience will be enhanced through the development of a new Visitor's Center and Museum. In addition, a new storage facility is required for the long-term preservation of the Park's collections of artifacts and documents. The park will need to work with local government and other partners to control both traffic and additional development adjacent to the new facility.

b 3. In our opinion, the best strategy for handling future issues and responsibilities relating to the Section 106 process is through a Programmatic Agreement.

Finally, as was discussed in our recent meeting, in our opinion, the continued housing of NPS employees within historic buildings is appropriate, as this will serve to help maintain and preserve such buildings within the Parks.

If you would like to discuss our review of the Draft General Management Plan, please contact Mark Shaffer at (717) 772-0924.

Sincerely,

Brent D. Glass

Brent D. Glass

## RESPONSES

b NPS concurs, and a programmatic agreement would be negotiated between your agency, the Advisory Council and NPS, and signed prior to the issuance by NPS of a Record of Decision.

## Pennsylvania Historical and Museum Commission

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

January 6, 1999

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
U. S. Department of the Interior, National Park Service
Gettysburg, PA 17325

Re: Rosensteel National Museum, aka Visitor Center/Administration Building, Gettysburg National Military Park

Dear Dr. Latschar:

Your request for concurrence that the Visitor Center in neither individually eligible for listing in the National Register nor contributing to the Gettysburg National Military Park has been reviewed by the Bureau for Historic Preservation. It is our opinion that the Rosensteel Museum was significant for its role in the development of Gettysburg tourism in the early to mid-twentieth century, however, the building has lost integrity due to alterations in the past 50 years. Due to alterations, the building is neither individually eligible for the National Register nor contributing to the Gettysburg Battlefield Historic District or the Gettysburg National Military Park.

Enclosed is a signed copy of the concurrence.

Sincerely,

Brenda Barrett, Director
Bureau for Historic Preservation

Enclosure
BB/gr

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We would like to take this opportunity to confirm that the NPS has fulfilled its responsibilities under the National Historic Preservation Act, as amended, to identify and evaluate all historic structures at Gettysburg NMP which may be eligible to the National Register of Historic Places. In particular, we would appreciate your concurrence that the visitor center is not a historically significant structure, is not a contributing feature of Gettysburg NMP, and does not meet the criteria of evaluation for inclusion in the National Register of Historic Places.

Sincerely,

Dr. John A. Latschar
Superintendent

Concur: _____ Date: 1/12/99
Pennsylvania State Historic
Preservation Officer

**BOROUGH OF GETTYSBURG**
ADAMS COUNTY, PENNSYLVANIA
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William E. Troxell, Mayor
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John C. Eline, President
Holliday Giles, Vice President
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Harold A. Eastman, Jr., Borough Solicitor

GETT — EISE

October 14, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

Enclosed are a summary and full text containing the comments of the Borough of Gettysburg regarding the draft General Management Plan and Environmental Impact Statement for the Gettysburg National Military Park. These comments were unanimously adopted at Council's October 13, 1998 meeting.

Distribution of this document will be the same as that for the similar report previously generated by Borough Council in May 1998.

Sincerely,

William E. Troxell, Mayor
John C. Eline, President
Holliday Giles, Vice President
Leonard Andrews, Councilor
Margaret S. Johnston, Councilor
Richard M. Kreisher, Councilor
Jay R. Schmitt, Councilor
Theodore H. Streeter, Councilor
John R. Wiley, Councilor
Charles E. Woodward, Councilor

encl

## Borough of Gettysburg

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the GMP until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the GMP/EIS. Working with the public, NPS established goals for the GMP (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

## COMMENTS

MEMORANDUM FOR: John Eline October 13, 1998

FROM: Holly Giles

SUBJECT: Summary of National Park Service Committee Report

After considering the comments of the citizens and business community of Gettysburg Borough and rendering its own assessment, the National Park Service (NPS) Committee has concluded that the draft Gettysburg National Military park (GNMP) General Management Plan/Environmental Impact Statement (GMP/EIS) is flawed in both substance and procedure, in summary, for the following reasons:

a. The entire GMP/EIS is predicated on the assumption that Alternative C (the Kinsley proposal) is the predetermined course of action, which renders the document meaningless as a planning vehicle. The Committee believes this approach violates the intent of the National Environmental Policy Act, Title I, Section 102, which requires rigorous exploration and evaluation of all reasonable alternatives to the proposed action.

b. The objectivity of the review process is questionable, in that all comments regarding the GMP/EIS submitted to NPS are reviewed only by NPS with no involvement of any disinterested, independent, objective party.

c. The Thomas Martin economic analysis is deficient in that Martin uses only secondary, rather than primary, source data and that the data used has been provided by the prime advocate of Alternative C, which calls into question its objectivity.

d. Martin failed to conduct a Borough specific economic analysis of its demographics, tax structure, tax base, income levels and business distribution, which would clearly have refuted any contention that Borough opposition to the GMP/EIS is based solely on the narrow, parochial interests of a few.

e. The GMP/EIS assumption that without a new Center visits to the battlefield will decline relatively, as will economic benefits to the Borough, is contradicted by studies published by the Friends of the National Park showing that in 1997 alone visitation to the GNMP rose by 94,350 and visitor expenditures were up by $2,673,761.

f. The GMP/EIS proposed sponsorship of a commercial activity on the battlefield contradicts written NPS policy.

g. The GMP/EIS does not address protection of the Baltimore Pike, the main Union supply route, from degradation through commercial activity.

## RESPONSES

**b** The ultimate responsibility for resource preservation and visitor use of a national park rests with the National Park Service. Although NPS considers all comments and suggestions pertaining to the draft GMP/EIS, from all concerned citizens, the final responsibility for making long-term decisions that are in the best interests of a national park's resources and the American public lies with NPS.

**c** Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP and the 15 meetings on the draft DCP, as were representatives of local municipalities. Appendix 10 indicates local business and municipal attendance at these public meetings. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5 lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period on September 9, 1998 to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

**d** NPS defined the area affected by the proposed alternatives as the communities within which the park is located and those that are adjacent to it. Visitor facilities within the park are located in five townships, and commercial services for tourists are located in these townships, adjacent townships and the

## COMMENTS

The following actions are recommended:

a. That the GNMP Superintendent suspend the artificially imposed deadline for comment on the GMP/EIS pending a thorough review and revision of the document;

h b. That other agencies, including the Pennsylvania Historical and Museum Commission and the Advisory Council for Historic Preservation begin an immediate review of the Borough's request, and consider engaging the Borough further in the process as a "Consulting party";

c. That our nationally elected officials become actively involved in this process, to include oversight and public hearings within the Borough of Gettysburg.

## RESPONSES

Borough of Gettysburg. For this reason, the economic assessment incorporated all of the communities that might be affected by the alternatives incorporated in the draft GMP/EIS.

NPS discussed the affected area it felt was appropriate during public scoping and resource workshops. During the various public workshops, NPS was asked to consider the impacts of the proposal on specific segments of the tourism economy, and this was done. However, NPS was not asked to perform separate economic assessments during these scoping meetings.

The draft GMP/EIS notes that although some individual businesses may be affected by the proposal, the overall economic impacts from the action alternatives on the economy of the affected area are positive. Therefore, NPS does not believe that a separate analysis of the economic impact from the proposal on the Borough of Gettysburg would provide additional useful information.

e The economic assessment completed for the draft GMP/EIS suggested that visitation would decrease in the next ten years if no actions to improve the visitor experience were taken by NPS. This was because of a number of factors, described on page 230 of the draft GMP/EIS. These include the increasing domination of the travel and leisure industry by major destinations, investments in other attractions and visitor infrastructure in the region and throughout the U.S., lack of marketing by NPS, and other factors. The analysis suggests that the increases in visitation seen at Gettysburg NMP in the last decade may have been driven by media exposure from films and television series, and by general market growth, factors that are expected to dissipate. In any event, the purpose of the draft GMP/EIS is to protect resources and provide for visitor enjoyment and that decreases or increases in levels of visitation are not motivating factors for developing the draft GMP/EIS alternatives.

f The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an

**FROM: Holly Giles, Chair** **October 13, 1998**

**TO: John Eline, President**

**SUBJECT: Final Report of the National Park Service Committee Regarding the General Management Plan and its Impact on the Borough**

On September 16, 1998, the National Park Service (NPS) Committee of the Gettysburg Borough Council met to hear citizen comments and reactions to the **Draft General Management Plan/Environmental Impact Statement** (GMP/EIS) proposed by the NPS for Gettysburg National Military Park (GNMP). These comments, along with the Borough's, are incorporated into this report and will be provided to the National Park Service as the Borough's official position on the GMP/EIS.

Before opening the floor to comments, attendees were briefed by the NPS Committee and Main Street-Gettysburg, Inc. concerning the activities of the NPS Working Group. The Working Group, consisting of representatives from the NPS Committee, the National Park Service, Main Street-Gettysburg, Inc., the Kinsley Group and the Borough staff, has been seeking ways to increase tourist visitation into the Borough itself separate and apart from the GMP/EIS and as a supplement to the Kinsley proposal, should that proposal be developed. So far, the NPS Committee believes that the group has made considerable progress and it is hoped that the cooperative spirit exhibited to date will continue regardless of the final disposition of the GMP. The NPS Committee stressed that there would be no actions taken within the Working Group which would compromise or undermine the positions taken vis-à-vis the GMP/EIS by Gettysburg citizens.

After listening to the concerns of the citizens of Gettysburg and making its own assessment, the Committee has concluded that the **Draft General Management Plan/Environmental Impact Statement** is a seriously flawed document in terms of substance as well as its compliance with federal statutory requirements under the National Environmental Policy Act (NEPA). The areas of challenge fall generally into the following categories:

a (cont.) **Conceptual:** The Committee believes that the GMP/EIS, as a general statement of conditions and facts, must be deductive in nature. That is, the document must explore the broad spectrum of options available for action, determine the pros and cons of each, and through a process of elimination or deduction, arrive at an alternative which seems the most feasible. The GMP/EIS fails to do so, for the entire document is structured around the assumption that a new Visitor Center will be built on the LeVan property along the Baltimore Pike. With regard to the Visitor Center, the plan does not consider the option of rehabilitating the existing building or any variation thereof. It does not discuss any alternative locations for the proposed Visitor Center, and automatically assumes the presence of commercial facilities. Most significantly, it completely fails to explore locating

educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

g Like the commentors, NPS believes it is in the best interests of the park's resources to limit additional roadside development on the Baltimore and Taneytown Pike gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 *Land Protection Plan* (LPP). The protection of the Baltimore Pike corridor, and other road corridors and lands significant to the outcome of the battle, is discussed in the draft GMP/EIS on pages 100-105, 197, 204 and 248. The language in the draft GMP/EIS regarding the protection of Baltimore Pike has been strengthened. NPS will work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to protect these corridors.

The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed museum complex. This use will be removed and the land will remain open if any of the draft GMP/EIS action alternatives are implemented. NPS would continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the museum complex remains residentially zoned. This issue is discussed on pages 100-105 of the draft GMP/EIS.

h In accordance with the 1995 Programmatic Memorandum of Agreement between the National Park Service, the National Council on State Historic Preservation Officers, and the Advisory Council on Historic Preservation, the NPS has been in consultation with the Pennsylvania Historic and Museum Commission (the Pennsylvania State Historic Preservation Officer – the SHPO) concerning plans for a new museum complex since February 1995,

## COMMENTS

some of the elements of the complex (such as portions of the administrative, curatorial, or interpretive components) within the Historic District of the Borough of Gettysburg . While the document proposes adding the Historic Wills House on Lincoln Square to the Park boundary (p. 82), and acknowledges the importance of Gettysburg's Historic Pathway Plan and the need to "Establish an NPS presence downtown to ensure that the story of the town and its non-combatants is properly presented and interpreted"(p. 92), it does not expand upon this discussion of "an NPS presence" to propose development of a portion of the NPS facilities downtown. This failure certainly appears to ignore the intent of a succession of Presidential Executive Orders mandating that every effort be made to locate federal facilities in historic downtowns--most recently affirmed by President Clinton's Executive Order #13006 (May 21, 1996)

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Indeed, not only is a strategy for implementing this Executive Order not mentioned as a meaningful alternative, but the reader learns early in the document (p. 23) that Alternative C (the Kinsley proposal) is the chosen option and that the mechanisms for implementing that option, i.e., purchase of the land and establishing a foundation, have already been set in motion. This alone renders discussion of any remaining alternatives meaningless, and indeed negates the very purpose of the GMP/EIS as a planning document. For this reason, the Committee believes that this approach violates the intent of the National Environmental Policy Act, Title I, Section 102--particularly in regard to the Council on Environmental Quality regulations concerning the requirements of the lead agency (i.e., the National Park Service). Those regulations clearly state that the NPS must rigorously explore and evaluate all reasonable alternatives to the proposed action, with discussion sufficiently detailed to allow the public an opportunity to evaluate the merits of the alternatives presented. Moreover, alternatives that would require legislative action or only offer a partial solution are not exempt from consideration. By any reasonable standard under NEPA requirements, we believe this document is incomplete.

a (cont.)

In view of these concerns, the Committee believes the current review process to be deficient. The process now in place stipulates that all public comment be sent directly to the Superintendent of Gettysburg National Park and implies that the NPS will alone review the comments for their merit and possible inclusion into the final GMP/EIS. While it is already assumed in the federal statutory requirements that other appropriate agencies must comment (notably the Pennsylvania Historical and Museum Commission), the Committee now believes the Borough should have been designated in the EIS process as a "Cooperating Agency," with its concerns and information directly incorporated into the development of the Alternatives.

**Economics:**

The Committee as well as the Borough's business owners have been characterized in public statements by the Superintendent and by members of the Park's Advisory Commission as a small group of individuals whose opposition to the GMP/Kinsley proposal as outlined in Alternative C is based solely on greed and/or fear that their businesses will suffer, and that they constitute an insignificant number of whiners. The

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## RESPONSES

and has been in consultation with the SHPO and the Advisory Council on the GMP planning process since May 1997. Since the Borough of Gettysburg does not share the legally-mandated responsibilities of these three agencies for the preservation of federal historic resources, the Borough is not considered to be "consulting party" to these consultations.

i The draft GMP/EIS recommends that NPS participate in partnerships to own, operate and manage two historic properties in downtown. In particular, the draft GMP/EIS recommended that the park boundary be adjusted to incorporate the Wills House (the house where Lincoln stayed the night before he gave the Gettysburg Address) and that NPS work with partners to acquire, manage and operate the property as a visitor contact station. It also recommends that NPS establish a presence in the downtown area. Recently, NPS has moved its monument shops into an historic building in downtown Gettysburg. These potential and completed actions indicate that NPS takes seriously the mandate to locate federal facilities in historic downtowns where such actions are feasible and appropriate.

However, there is no indication that a suitable and feasible location for the park's collection storage, museum and visitor center complex is available in downtown Gettysburg. Under the RFP, NPS' criteria would have given preference to locations that incorporated appropriate historic sites within the Borough of Gettysburg. No proposals for specific properties within the Borough of Gettysburg were received. NPS is not aware of any historic property in the Borough of Gettysburg that would meet its needs and has never received a proposal from any government or private group suggesting that appropriate historic facilities can be found in the town for the location of the park's main collections storage and museum complex.

j The draft GMP/EIS acknowledged that the relocation of park visitor facilities might change visitor spending patterns and create indirect effects on area development or individual businesses (pg 246). The impact of the alternatives on pedestrians were considered, and, at the request of the Borough of Gettysburg and others who attended public workshops, actions to mitigate possible effects were incorporated into the plan alternatives. These actions include: NPS partnership in the development of the Wills House; an NPS

## COMMENTS

Committee knows this to be a decidedly unfair characterization, and one, which, in any case, should have been entirely avoided in public comments made by the NPS as "lead agency." Furthermore, we believe such a characterization would have been soundly refuted had more thorough economic research been done. It is the lack of such research and its inherent bias which this Committee believes is subject to procedural challenge under the requirements of NEPA, and which again points out the need for the document to be revised in order for the public to properly assess "reasonable" alternatives to Alternative C.

In this regard, Thomas Martin and Company, which compiled the economic data to support Alternative C, erred in two respects--one being the scope of its research and the other being the data incorporated into its report. With regard to the former, Thomas Martin acknowledged that it had analyzed the economic impact of a new Visitor Center on the area, but had not performed an analysis on the Borough itself. Had it done so, Martin would have ascertained that Gettysburg has much in common with other small towns, but at the same time is in a unique position.

On the one hand, Gettysburg typifies the American small town which is dependent upon one industry in that anything which impacts upon that industry cannot help but cause a ripple effect throughout the Borough economy. As an example, there are 110 small

j businesses--motels, gift shops, museums/tours and food service--within two-fifths of a mile of the present Visitor Center. The Borough depends very heavily upon tax revenues generated by these businesses to finance its basic operations--i.e., police, fire, maintenance, etc. Movement of the Visitor Center to a location which discourages pedestrian access cannot help but have a negative impact upon these businesses.

The foregoing can be illustrated by an example offered by Thomas Martin himself. Martin projects that Alternative C (the "preferred alternative") will attract close to two million visitors to the battlefield. Martin further estimates that 75% of the two million (or

k 1.5 million) will patronize the Visitor Center and that 41% of those (615,000) will, in some manner, utilize the food service facilities planned at the new Center. Even projecting (generously) that one-third of those would be nothing more than soft drink purchases, this still means a loss to the Borough of 400,000 food service transactions per year, which by any calculation is devastating. And, this example does not take into account the loss of gift purchases which often accompany food transactions.

Gettysburg, however, is also unique. Whereas many small towns which lose an industry have transformed themselves by attracting new means of livelihood, the Borough is inextricably tied to tourism for its existence. Gettysburg is virtually surrounded by the battlefield--there is no room for expansion nor is annexation now permitted under state law. Therefore there is insufficient space to attract into the Borough any industry which will employ its residents to the extent that tourism now does.

In addition to ignoring the Borough in his study, Thomas Martin also admittedly relied

l solely on secondary data provided by the National Park Service. The Committee believes the objectivity of such data can be questioned and that a study of such importance cannot be properly done without primary source research. Had such research been done, Martin would have ascertained that the presence in Gettysburg of NPS property, Gettysburg College, The Lutheran Theological Seminary, Gettysburg Hospital and the Gettysburg



## RESPONSES

ranger presence downtown; strengthening the historic pathways pedestrian environment; expansion of NPS' auto tour to include downtown Gettysburg; inclusion of a downtown/NPS visitor center shuttle; continued promotion of local visitor services by the Visitors and Convention Bureau in the park visitor centers; and routing of the auto tour along Steinwehr Avenue. NPS and the Borough of Gettysburg have signed a Letter of Intent to begin development of interpretive planning for these activities. NPS believes that these actions would strengthen the historic district, enhance pedestrian use of the area and improve the visitor experience.

The impact of these actions was considered in the economic analysis, which predicts an overall positive impact on the local economy and tourism as a result of the action alternatives proposed in the draft GMP/EIS. That analysis indicates that the proposal would have a positive impact on the local economy.

k NPS evaluated the impact of the cafeteria-style restaurant in the proposed museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

## COMMENTS

l (cont.)

Public Schools render 51% of property within the Borough tax exempt, which means virtually all Borough municipal operating revenues must be derived from the remaining 49%. Essentially, this means that a Borough of 7,000 people is financing not only its own operations but is also providing infrastructure support to the 1 7 million visitors it hosts each year. This tax burden is levied on a population of which more than 60% are low to moderate income, and nearly 25% senior citizens--many on fixed incomes. Martin would also have learned that the 110 businesses mentioned above employ some 1100 people, and that they generate a substantial part of the Borough's tax revenues. Borough property taxes are already close to the limit permitted under State law, and already 67 times higher than that of surrounding townships of Cumberland and Straban. The state tax code also prohibits us from raising revenue from a "pillow tax," and a recent change in state law has frozen amusement taxes at current levels.

e (cont.)

There are in addition to the limitations of the Martin analysis, other discrepancies in the GMP/EIS economic assumptions. That document implies that without a new visitor Center visits to the battlefield will decline as will the economic benefits to the Borough. However, the 1994, 1995, 1996, and 1997 studies published by the Friends of the National Parks at Gettysburg under the title **Economic Impact on Gettysburg and Adams County** clearly suggest otherwise. For example, the 1997 report concludes that "The National Park Service, Eastern National Parks and Monument Association, the Licensed Battlefield Guides and the Friends of the National Parks at Gettysburg collectively spent or generated $6,576,849 into the local economy in 1997, as compared to $6,083,724 in 1996." This represents an increase of almost $500,000. The studies also reveal that visitation to the park has remained over 1 7 million since 1994, when visitation jumped over 200,000 from the previous year. These increased figures call into question the assumptions of the GMP/EIS.

Lastly, but no less significantly, the National Park Service has historically made it a practice to systematically remove business from within the Park and to instead encourage business development in areas adjacent to it--the main reason for the number of businesses mentioned that are within pedestrian distance of the present Visitor Center. It appears incongruous that the Park Service *is* now proposing to not only encourage, but sponsor a business within the Park boundary which will compete (successfully, according to its projections) with local entrepreneurs.

**Historic/Cultural:**

1. The very vitality of Gettysburg's historic buildings and streetscapes is closely linked with the success of the business community, and the need to provide opportunities for those businesses to grow by encouraging more pedestrian traffic in downtown Gettysburg.

i (cont.)

While the Historic Pathway Plan clearly identifies these priorities, and they are referred to in the GMP/EIS, no Alternative is provided which clearly proposes making adaptive use of some buildings in the Borough's Historic District to encourage the Pathway Plan objectives, or suggests that a consideration of this option might negate the need for a new Visitor Center, or one as large as outlined under Alternative C. The Borough is aware that the NPS explored the possibility of using the

4

## RESPONSES

It is also important to note that these food sales transactions do not exist today, or would exist in the future under the no-action alternative. Instead, the draft GMP/EIS suggests that there is the potential for increased food sales both within the museum complex and within the local economy. The economic assessment suggests, as noted above, that even with food sales in the museum complex, there would still be increases in the community in food sales. Therefore, NPS does not consider that there would be losses in food sales to the local community under the alternatives; instead, the local community would see an increase in food sales.

l Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP and the 15 meetings on the draft DCP, as were representatives of local municipalities. Appendix 10 indicates local business and municipal attendance at these public meetings. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5 lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period on September 9, 1998 to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

High Street School (built 1857) for administrative offices, and previously participated and assisted in funding a major study by Main Street-Gettysburg, Inc. that identified the potential to locate a major interpretive center at the Wills House in Lincoln Square. But these exploratory efforts in attempting an NPS presence downtown, or in revealing to the public the feasibility of re-developing the Wills House and adjacent Masonic Building as a substantial interpretive center are not divulged in the GMP/EIS

m The failure to explore this Alternative again raises the point we identified earlier about locating federal facilities in historic downtowns, and raises the statutory question under NEPA about how committed the NPS is to considering "all reasonable alternatives" when the GMP/EIS already identifies actions that are moving ahead to implement Alternative C

g (cont.) 2. Closely connected to the vitality of Gettysburg's Historic District is the appearance of the entryways into the Borough. Identified as a key issue in the Borough's Comprehensive Plan, the Borough is increasingly concerned about the impact the proposed Visitor Center will have on the Baltimore Pike Corridor (Rt 97). While this area lies outside Borough boundaries, the properties there are located in an area designated as historically sensitive in the 1988 Boundary Study Hearings, and the prospect of a major Outlet Mall in Mount Joy Township just south of the Park's southern boundary creates the potential for further commercialization and degradation of this area. The relocation of the Visitor Center has the real potential to shift the commercial core from Steinwehr Avenue in the Borough to those portions of Cumberland and Mount Joy Township closest to the facility

n 3. In suggesting adjustments to the 1990 Boundary Expansion of Gettysburg National Park (Public Law 101-377), the GMP/EIS identifies a tract adjacent to the "Home Sweet Home Motel" on Steinwehr Avenue, and indicates that the Motel is also in the existing boundary. Moreover, the plan identifies adding the Wills House in Lincoln Square. No further discussion is provided about the potential for lost (or gained) tax revenue, or the potential to exchange the NPS owned parcel to the Borough or Adams County to offset the loss of tax revenues. Because of the ambiguities of the 1988 Boundary Study that led to the unfortunate Seminary Ridge Land Exchange between the NPS and Gettysburg College, it is critical that these impacts be more fully explained in the final GMP/EIS.

4. The Committee has noted the recent endorsement by three prominent American historians (Eric Foner, James McPherson, and Nina Silber) of the expanded interpretive plan for the Battle as outlined in Alternative C. We particularly agree that the experience of the community and the Battle needs to be more thoroughly presented, especially the role of the African-Americans in our community. This can be done in the framework of developing programs on the Park as well as interpretive links with the Lincoln Cemetery and other areas identified by the Lincoln Cemetery Project Committee, Main Street-Gettysburg, and others

5



m Between August 1995 and April 1996, NPS prepared a *Draft Development Concept Plan/Environmental Assessment* (DCP) to explore alternatives for the needed facilities. Development Concept Plans are tools that NPS uses to solve facility concerns. The DCP included four alternative concepts for the new facilities: (a) a no action alternative, (b) building a collections and archival storage facility and leaving the Cyclorama and visitor centers as they are; (c) building a new Cyclorama building combined with collections and archival storage and renovating the existing visitor center in place, and (d) building a new combined facility incorporating all these uses. The DCP was put out for public review for 45 days in April 1996. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. The majority of the public comments which were received agreed with the NPS's choice of Alternative D, building a new combined facility in a new location.

Based upon that public response, NPS released a Request for Proposals in December 1996, seeking a partner or partners to assist in the accomplishment of the DCP's preferred alternative. The RFP process resulted in the selection of a proposal for negotiation in November 1997, and a revised proposal in June 1998. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal.

Scoping for the park's draft GMP/EIS had been initiated in April 1997. Based on the public input received on the DCP, the GMP/EIS and other public comment, the NPS determined that it was desirable to incorporate the issues of visitor use and interpretation at the museum facilities as an element of the forthcoming draft GMP/EIS.

n The administrative or legislative boundary changes recommended by the prescriptions common to all action alternatives individually have potentially positive, negative or neutral affects on the local tax base. Several parcels are owned by NPS, so administrative changes to correct boundary map errors would not affect local tax base. Recommendations for deletions from the boundary would likely have positive tax effects. Other administrative changes, such as adding the Battlefield Military Museum parcel to the boundary map to correct a previous error would not result in changes different from those

## COMMENTS

In summary, the Committee believes the GMP/EIS, while addressing many important issues, is a seriously deficient document subject to challenge because it fails to meet the test of providing "reasonable alternatives" to a decision already made to build a new Visitor Center on the LeVan property in Cumberland Township. The Committee further believes that these deficiencies can and must be addressed by our nationally elected officials and other federal agencies charged with review of this document. To that end, the Committee recommends that:

> The Superintendent suspend the artificially imposed deadline for comment on the GMP/EIS pending a thorough review and revision of the Alternatives to be presented in a Supplemental Draft EIS.
>
> That other agencies, including the Pennsylvania Historical and Museum Commission and the Advisory Council for Historic Preservation begin an immediate review of the document and, in view of the Borough's concerns and those stated by many others, urge the NPS to develop a Supplemental Draft EIS, fully utilizing the Borough as a "Cooperating Party" in the process.
>
> That our nationally elected officials become actively involved in this process, to include oversight and public hearings within the Borough of Gettysburg.

Although the Committee acknowledges that this will entail a prolonged and laborious effort, it must also point out that had a proper planning process been adhered to from the beginning, few if any of the major objections to the GMP/EIS which now exist would have arisen.

In closing, the Committee wishes to acknowledge the efforts of State Representative Stephen Maitland, the only elected official who actively and meaningfully participated in this process. His comment that "elected officials owe more to their constituents than they do to the National Park Service" should serve as a reminder to others of their priorities.

Lastly, the Committee wishes to reaffirm its faith in the democratic process, slow and painful as it sometimes is. The Committee has little doubt that in the long run the wishes of the people will be heard above those of special interests, be they private or government.

6

## RESPONSES

contemplated by the boundary legislation. Adding the Wills House to the park boundary would allow NPS to undertake actions requested by the Borough of Gettysburg. NPS acquisition of the building would have a negative impact on local real estate taxes. However, the operation of the Wills House as a visitor venue could have a positive effect on amusement and other tax revenues. Therefore, this change could have a positive, negative or neutral effect on local taxes, depending on the specific operational configuration of the building. In all, local taxes should stay relatively stable. Section 4.4.4 of the GMP/EIS has been changed to reflect this information.

**BOROUGH OF GETTYSBURG**
ADAMS COUNTY, PENNSYLVANIA
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William E. Troxell, Mayor
Charles W. Sterner, Treasurer and Borough Manager

John C. Eline, President, Council
Holliday Giles, Vice President
Sara L. Stull, Borough Secretary
Harold A. Eastman, Jr., Borough Solicitor

December 14, 1998

Honorable Rick Santorum
Russell Senate Office Building
Room 120
Washington, DC 20510

Dear Senator Santorum,

As we alluded to in our previous letter, the Borough Council, in consultation with selected Gettysburg citizens, has compiled a list of projects which, when implemented, will offset the adverse economic impact of the proposed NPS General Management Plan.

The Comprehensive Road Improvement Study presently being conducted by PennDOT in Adams County is of urgent concern. As the CRIS in now underway, it is imperative that the Borough provide input before PennDOT finalizes the study. Transportation Enhancement Act grant applications recently submitted by the Borough are also of immediate concern. Use of your good offices as an advocate for the Borough in these matters would be of immense help.

We are eager to work with you and your staff on each project cited on the enclosure, and again we thank you for your interest in assisting the Borough of Gettysburg.

We look forward to hearing from your office and to begin working together for the benefit of the NPS as well as the Borough.

Sincerely,

John C Eline
President

William E Troxell
Mayor

cc Dr John Latschar



## Borough of Gettysburg

**a** The NPS' economic analysis indicates that the impacts upon the local economy, which includes the Borough of Gettysburg, would be positive because of all the action alternatives. For example, if the proposal were adopted, visitor spending would increase by 21.5% or more than $24 million dollars per year in the greater Gettysburg area. The economic analysis also suggests that this increase in revenues will increase overall tax revenues for local communities.

**b** NPS agrees that the Wills House is an important component of interpretation of the Borough of Gettysburg, and the draft GMP/EIS suggests a legislative or administrative boundary adjustment to incorporate the Wills House within the park boundary. It also suggests that the Borough, the Commonwealth of Pennsylvania, private nonprofits and others cooperate to acquire, rehabilitate and operate the Wills House.

**c** NPS concurs, and the draft GMP/EIS (on pages 204-205) discusses these issues and the need for the Comprehensive Road Improvement Study. NPS has pledged assistance in these efforts.

**d** NPS concurs, and would cooperate with the Borough of Gettysburg as appropriate coordinate its activities with those of the Borough of Gettysburg in this regard.

**e** NPS concurs, and although the Transportation Enhancement Act application did not result in a grant, NPS would continue to support efforts to improve the sidewalks, historic pathways and other areas.

**f** NPS evaluated the impact of the cafeteria-style restaurant in the proposed museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The

## COMMENTS

SUBJECT: Projected Economic Enhancements to the Borough of Gettysburg

The opposition by the Borough of Gettysburg to the General Management Plan (GMP) proposed for the Gettysburg National Military Park (GNMP) has been consistent in two respects. First, the Borough has always focused solely on the potential economic impact of the GMP, specifically the planned Visitors' Center, upon the fragile tax base of the community. Secondly, the Borough's opposition has always been conditional. That is, while the Council has opposed the Visitors' Center concept in its present form, it has always acknowledged that certain changes to that concept may alter the Council's opposition.

a

It appears from the recent discussion held between Borough officials and Senator Santorum that it may be possible to introduce changes which will not only insure the economic viability of the Borough, but will in the process enhance its historic aura and in the long run benefit both the National Park Service and the Gettysburg community by making Gettysburg itself an attraction equal to the GNMP.

The following is a discussion of the projects the Borough feels are necessary to accomplish the foregoing. The Council recognizes that not all can be implemented at this time, but does believe that planning for them can be initiated to coincide with Visitors' Center and GMP development. Secondly, the projects are not listed in order of priority, although some may and should be addressed immediately.

b

- The Council welcomes Senator Santorum's suggestion that the NPS buy, **staff and maintain the Wills House.** That structure, along with the train station now being restored, will provide a strong anchor for the downtown area and will provide GNMP visitors with a positive incentive to explore and experience the center of the Borough

c

- Of urgent concern for two reasons is the **Comprehensive Road Improvement Study (CRIS)** which has recently been undertaken in Adams County by PENNDOT. First, in order for attractions such as the Wills House and downtown shops to be more readily accessible, the downtown area must become pedestrian friendly. This could be achieved in large measure by **development of an alternate truck route** which would enable drivers to circumvent the Borough, thus alleviating congestion while enabling them to travel unimpeded by local traffic conditions. In this instance, a two lane enhanced system, rather than anything more elaborate would probably be sufficient. It is also imperative that the CRIS include measures to **coordinate the flow of traffic between the GNMP battlefield avenues, Cumberland Township and Gettysburg Borough.** As mentioned, these two matters should be addressed as soon as possible, as the CRIS has already begun.

d

- An additional traffic measure which would vastly improve parking within the Borough would be **construction of a second municipal parking garage**

## RESPONSES

findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

The book/museum store operation in the current visitor center operates under the strict NPS guidelines. Under these guidelines, all items sold must support the education, interpretive and related purposes of the park, and the sales area is considered an element of the park's overall interpretive program. All proceeds from the operation of the book and museum store benefit NPS. Therefore, because these items are related to the interpretive and educational mission in the park, it is essential that the items offered for sale continue to evolve as new information, scholarship and educational tools become available. For this reason, NPS cannot agree to restrict the scope of items sold there, beyond the significant restrictions imposed by NPS policy. The facility will be sized to manage comfortably the anticipated visitation.

g NPS concurs that some parking should be retained to serve the Soldiers' National Cemetery. Although the draft GMP/EIS does not indicate a specific location for parking for the Cemetery, NPS would develop a parking area to provide access to this site. Its exact size and location would be based upon recommendations of engineering and design consultants. This parking would serve the need noted by the Borough of Gettysburg. However, NPS does not concur that the park would benefit from the restoration of the Rosensteel

## COMMENTS

within the downtown area. This garage could also serve the needs of the Adams County Courthouse as well as those of visitors.

e - The Borough of Gettysburg is now submitting an application for a grant under the Transportation Enhancement Act. Monies will be used to **bury utility lines and lay brick sidewalks in the Steinwehr Avenue, Baltimore, York, Carlisle and Chambersburg Street corridors.** Any assistance which would help the Borough secure such funding would be helpful.

f - Figures supplied by Thomas Martin & Co. indicate that the cafeteria planned for the new Visitors' Center could have 615,000 food transactions per year, which could potentially devastate both the restaurant business in Gettysburg and the "spinoff" business generated for other establishments by restaurant patrons. This situation could be avoided by **eliminating food service facilities at the new Visitors' Center** except for soda and snack vending machines. Secondly, there should be **no expansion of the Eastern National Parks and Monuments Association bookstore beyond its present size and scope.** That is, the bookstore should be restricted to selling merchandise it presently carries rather than offering additional items.

g - Considerable benefit would be derived from **restoration of the Rosensteel museum to its original configuration and continuation of its use to house the Rosensteel family collection.** This action would serve not only as a gesture of good will, **but through retention of some parking at that facility** both the cemetery and Steinwehr Avenue would remain accessible to pedestrian traffic. Additionally, it would allow the new Visitor's Center to concentrate on the interpretive aspects of the battle.

h - **Free or low cost shuttle bus service between the new Visitors' Center, the Rosensteel building, along Steinwehr Avenue to the Wills House** would benefit all parties involved in this project.

i - The Council is concerned, not only from the economic viewpoint, that the Baltimore Pike (Rte 97), a major Union supply route into Gettysburg, will be subject to commerical development if the new Visitors' Center proceeds as planned. **The Council would encourage NPS and the developer to attempt to preserve the aesthetic beauty of what will become the gateway to the GNMP.**

The projects cited above are discussed at this stage only in general terms. The council looks forward to working closely with Senator Santorum and his staff in defining them more precisely and in implementing them as soon as practicable.

## RESPONSES

museum to its original 1920s configuration. The building lies over the site of significant battle action, and development there obscures the significant topography of the 1863 battle. Therefore, the NPS proposal does not consider restoration of the Rosensteel museum to its 1920s configuration as beneficial to its legislative purpose and mission.

h NPS concurs with the need for a shuttle system to serve visitors. Such a system would be a part of all of the action alternatives, and is discussed in the draft GMP/EIS on pages 76, 77, 92, 96 and elsewhere, and is shown on figures 20, 24 and 27. These figures indicate that the shuttle would link the new museum complex, along Steinwehr Avenue, to the Wills House, as you suggest.

i Like the commentors, NPS believes it is in the best interests of the park's resources to limit additional roadside development on the Baltimore and Taneytown Pike gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 *Land Protection Plan* (LPP). The protection of the Baltimore Pike corridor, and other road corridors and lands significant to the outcome of the battle, is discussed in the draft GMP/EIS on pages 100-105, 197, 204 and 248. The language in the draft GMP/EIS regarding the protection of Baltimore Pike has been strengthened. NPS will work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to protect these corridors.

The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed new visitor center. This use will be removed and the land will remain open if any of the GMP action alternatives are implemented. NPS will continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the visitor center remains residentially zoned. This issue is discussed on pages 100-105 of the draft GMP/EIS.

## COMMENTS

Erik F. Nelson
Senior Planner

City of Fredericksburg

October 13, 1998

Mr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

RE: Draft GMP and EIS

Dear Mr. Latschar:

Thank you for the opportunity to examine the draft General Management Plan and Environmental Impact Statement for Gettysburg NMP (August 1998). The publication is quite thorough and clearly documents the enormous challenges you face in preserving a significant national resource.

I have been extremely impressed with the visual impact that scene restoration has had on battlefield resources, at Gettysburg and elsewhere. I strongly support Alternative C, which would continue these efforts. The result can only enhance the resource in your charge.

Thank you for the opportunity to comment.

Very truly yours,

Erik F. Nelson
Senior Planner

EFN:rs

## RESPONSES

### City of Fredericksburg, Virginia Senior Planner

CUMBERLAND TOWNSHIP
BOARD OF SUPERVISORS
ADAMS COUNTY, PENNSYLVANIA
1370 FAIRFIELD ROAD
GETTYSBURG, PA 17325

October 13, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

The Cumberland Township Board of Supervisors is very proud to have the Gettysburg National Military Park and Eisenhower National Historic Site within our boundaries and we have a sense of custodianship for these priceless resources. We have reviewed the Draft General Management Plan and Environmental Impact Statement dated August 1998 and overall we agree with the sense of the plan, however, we take exception with three issues:

| | |
|---|---|
| a | • The deforestation of from 500 to 1,000 acres of woodlands will have a severe environmental impact on the Park's neighbors and the Township. |
| b | • Changing the two-way traffic patterns to one-way will cause serious traffic impacts on the Township roads. |
| c | • While we appreciate the review process of the General Management Plan, we believe that the Park Service should communicate directly with the Board of Supervisors on such critical issues. |

We sincerely hope that you would consider these issues and revise the plan so that it will be in harmony with the Park, its neighbors and the environment.

Sincerely,

Thomas D. Shealer
Vice-Chairman

cc Congressman William F. Goodling
Senator Arlen Specter
Senator Rick Santorum

## Cumberland Township

a Although the removal of trees would have impacts on the park's neighbors and the Township, the NPS does not feel it would have severe negative effects. All four alternatives have environmental consequences that were considered in the draft GMP/EIS. The no-action alternative, in which no trees are removed, favors forest species, most of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed threatened or endangered species.

The process by which trees may be removed would vary depending on the site. Best management practices will be applied to all sites to minimize the impact of tree removal on the park and its resources. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. This would have minimal impact on most species because most of the wooded area would be retained. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available to open those areas and maintain them, the corridors would be enlarged until the area is fully restored. No areas will be cleared unless the money and labor has been secured for the long-term maintenance of these areas. Cutting during the winter when the ground is frozen would reduce soil erosion and sedimentation in the streams while also not affecting species during their breeding seasons. Seeding and the planting of native plants as soon as possible after the cutting would also reduce erosion and help prevent the establishment of non-native species. The park would also work with its neighbors and partners to look for opportunities to assist in re-vegetation projects outside the park boundaries to help establish wooded areas that would not impact the historic landscape.

b The draft GMP/EIS for Gettysburg National Military Park does not change the one-way traffic patterns in the park. These were determined by the *Environmental Assessment for Rehabilitation of Park Roads, Gettysburg National Military Park*, November, 1994. A *Finding of No Significant Impact* was signed by NPS on November 29, 1994. An *Agreement with Local Govern-*

| COMMENTS | RESPONSES |
| --- | --- |
| | *ments* was developed and signed by Adams County, Cumberland Township and the Borough of Gettysburg on October 17, 1994 and amended January 26, 1999. These documents, agreements and amendments determined the roads to be made one-way and evaluated their impacts on local roads. |
| c | The NPS agrees, and would communicate directly with the Cumberland Township Board of Supervisors on all issues which jointly effect the park and the township. |

ANIMAL PROTECTION INSTITUTE
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October 13, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent:

I am writing on behalf of the Animal Protection Institute (API), and our 80,000 members nationwide, to comment on the *Draft General Management Plan and Environmental Impact Statement* for Gettysburg National Military Park.

Background

The management of our country's national parks, and that management's impact on the wildlife who reside there, is of great concern to API, our staff, and members. API is actively involved in a number of issues affecting animals found in national parks. As you are no doubt aware, API is a plaintiff in a pending legal action (*Davis et al. v. Latschar, et al.*, Civ. No. 97-00232 (PLF) (D.D.C.)) regarding deer management at Gettysburg National Military Park. As evidenced by our participation in this litigation, API supports the use of humane, nonlethal alternatives to resolve human-wildlife conflicts and strongly opposes lethal management of deer.

Deer Management Under Draft EIS

a Deer management in the park is specifically excluded from the Draft Management Plan and Environmental Impact Statement (EIS). The Draft EIS states that "because the park has an approved and implemented plan for management of white-tailed deer, it is not necessary to discuss this issue as a part of this general management plan" (p. 26). However, each alternative will affect both the availability of deer habitat and the need for deer control as they may increase or decrease area for saplings or other vegetation and crops directly impacted by the presence of deer. The National Park Service (NPS) must take a more programmatic approach to management issues at Gettysburg National Military Park. Consideration of a plan that significantly alters the landscape can not be undertaken without addressing the management of deer.

While the Draft EIS dismisses the need to address deer management, it proposes to alter the total population goal for white-tail deer from 80 to 65 under Alternatives B and C and from 80 to 49 under Alternative D. This is done on the basis of the proposed reductions in wooded acreage. The fact that this adjustment is being made to the population goal is an indication that the alternatives discussed in the Draft EIS do indeed impact deer management.

API IS A NONPROFIT, TAX-EXEMPT ORGANIZATION
ALL CONTRIBUTIONS ARE DEDUCTIBLE FOR INCOME AND ESTATE TAX PURPOSES



## Animal Protection Institute

a NPS does not believe that there is a need to complete a programmatic EIS for wildlife management. Between 1989 and 1992 the NPS explored the possibility of writing a Programmatic Environmental Impact Statement (PEIS) for white-tailed deer. In February of 1992, the Chief of the Wildlife and Vegetation Division in the Washington Office released a statement concluding that writing a PEIS was premature at this time. He went on to say, "the Service does not 'in fact' nor by declaration have a program for management of white-tailed deer. Problems are not defined specifically enough at the park-level and there is an insufficient base of information to realistically assess alternative scenarios." At this time it was also recommended that Gettysburg NMP should begin its EIS as soon as possible and involve close coordination of park, regional, and national staffs. The goals and objectives for white-tailed deer management are unique to Gettysburg NMP and Eisenhower NHS.

The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the GMP are the same as those approved in 1995. The objective is to maintain the density of white-tailed at Gettysburg National Military Park and Eisenhower National Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/Environmental Impact Statement (FWDMP/EIS) and draft GMP/EIS would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a law suit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white-tailed deer management program was reinstituted at the park 14 days later. The Plaintiffs have appealed this ruling and the matter is currently pending.

White-Tailed Deer Management Plan

The Park Service's preferred alternative as described in the Draft EIS proposes cutting down the very trees that the NPS argued were being destroyed by the deer. It also proposes changing the same croplands that the NPS claimed the deer were eating. Making these changes must necessarily affect the Park Service's perceived need to reduce deer numbers in the park.

The Council on Environmental Quality's regulations, which implement the National Environmental Policy Act, provide that Agencies:

(1) Shall prepare supplements to either draft or final environmental impacts if:

(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

In view of the agency's undertaking of the Draft General Management Plan and EIS for Gettysburg National Military Park, it must now prepare a supplemental Environmental Impact Statement. In this EIS, the Park Service must address the need for, the environmental impacts of, and the alternatives to, the lethal deer management program at Gettysburg.

Review of Draft EIS Alternatives

We support the aspects of the action alternatives (B, C, and D) which would change current agricultural programs to enhance wildlife habitat and protection of upland species. In particular, we support the removal of cattle from wetlands and the removal of field drains which would allow wetlands to regenerate.

We also strongly endorse conversion to more traditional agricultural practices; however, inadequate information is provided to enable us to choose between the three action alternatives in this regard. What crops might be grown, pesticides and fertilizers used, etc. are not specified. Conversion to traditional techniques provides an exciting opportunity for the introduction of more environmentally and animal friendly practices that we hope will be taken advantage of. For example, considering the other proposed changes, it appears that this would be an ideal time to implement low visibility fencing around crops to exclude deer from these areas.

Generally we support minimum rehabilitation of park structures and exhibits because we believe that more extensive rehabilitation would have a detrimental impact, in both the short and long-term, on wildlife. We also support minimum destruction of woodlands and/or conversion to woodlots.

Our preferred action would be to convert the agriculture to traditional means, restore historic field sizes, erect historic fencing around croplands, remove cattle from wetlands, and utilize shuttle transportation for visitors. These changes should, over time, result in fewer deer in the park and

eliminate the need to manage the population through lethal means

Thank you for considering our comments on the management of Gettysburg National Military Park.

Sincerely,

Dena Jones
Program Director

# COMMENTS

PO Box 4152 Gettysburg, PA 17325

October 11, 1998

Dr John Latschar, Superintendent
Gettysburg National Military Park
Visitor Center - Taneytown Road
Gettysburg, PA 17325

Dear Sir,

The Association of Licensed Battlefield Guides would like to go on record as favoring implementation of an amended form of Alternative C of the *Draft General Management Plan and Environmental Impact Statement*. We are in favor of the creation of a modern Visitor Center / Museum Complex on the proposed Levan site and the removal of the present intrusive structures from the Union battleline. ALBG feels, however, that the disruption of additional land inside the legislated boundary is only justified by the return of Ziegler's Grove to its war-time appearance. Building a new structure and leaving either of the two present buildings or their related facilities, is unacceptable.

The specific concerns we do have with Alternative C which we would like to see addressed in the final GMP are as follows:

* In general, we applaud the overall goal of Alternative C of restoring and rehabilitating significant landscapes. We have, however, experienced the results of similar NPS attempts in the past. The removal of cattle from the valley below Little Round Top and subsequent removal of non-historic holding fences have been an interpretive nightmare. Clearly unreasonable promises of mowing this area to keep brush down have failed and to date the long term maintenance of the valley and the west slope of Little Round Top is still uncertain. We would expect that sustainable and fundable plans are developed to keep re-opened woodlots, newly cleared areas, and restored thickets more or less permanently in that condition.

a * The idea of the old "War Department" pipe fencing is well known to ALBG from the 'Dark Days" of the Memorial Landscape philosophy. We were lukewarm to the idea then and continue to be with this plan. Clearly, well-developed plans of where these fences would be placed, how they would look, what materials they would require, what costs would be entailed in installing and maintaining, etc., etc would have to be developed before we would be convinced of the need for and advantage of this element of the GMP.

# RESPONSES

## Association of Licensed Battlefield Guides

a The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed when needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new modern design element into the commemorative resource area of the park. This is because the national significance of Gettysburg National Military Park extends not only to the battlefield and its 1863 landscape resources but also to the national park and its post-war commemorative landscape features. The creation of a national military park by the United States Congress in 1895 prompted battle veterans to transform certain portions of the battlefield into a formal designed park, which existed alongside preserved significant 1863 battle topography. Included in this transformation were the constructed and enclosed park avenues, additional monuments, tablets and cannon, and the observation towers. Before any commemorative features are reintroduced, NPS would complete implementation plans that would establish the management need for these features as well as their design, installation and maintenance.

## COMMENTS

• As many of our members are veterans of our country's armed forces, we object to certain elements of the draft document's plans for the National Cemetery. In an ideal world National Cemeteries would NEVER be given to or administered by the National Park Service as they are not parks, are not recreational areas, and do not exist to be "interpreted" to swarms of visitors. We recognize, however, the special place this cemetery holds in our nation's history. We deplore the fact that your predecessors chose to do things to alter the character of the Civil War section of the cemetery but feel that at this time it should be left as is. The historic Lafayette Square fence which has separated the two cemeteries for many years must not be replaced by a pipe fence. Any increase in interpretation above that already in place is undesirable. Despite the significance of Mr. Saunders, Mr. Wills, Mr. Lincoln and others to the history and development of the Soldier's National Cemetery it exists for one and ONLY one purpose - as a resting place for thousands of our country's veterans from 1862 to the present.

• Perhaps our greatest concern with the alternative is the perennial cropping up of the "tram" idea for traffic and visitor management. ALBG recognizes the Park's desire to lessen the impact traffic has on the park. We caution, however, any attempt to "homogenize" the Gettysburg story which a tram would tend to do. Gettysburg must be as personal an experience as possible. Visitors must continue to have free access to the field however they choose.

In conclusion we would like to state that we appreciate the tremendous amount of work that went in to the development of this document. We trust that it will successfully serve as a blueprint by which you and future park managers will work to reverse the damage caused by many years of neglect and misguided policies.

Frederick Hawthorne, President ALBG

Kevin Coughenour, Vice Pres ALBG

Debra Novotny, Treasurer ALBG

Edward Guy, Secretary ALBG

Howie Frankenfield, Parliamentarian ALBG

Don Walters, Ethics Chair ALBG

Louise Arnold-Friend, Executive Council

John Puss, Executive Council

Tony Nicastro, Executive Council

Jim Clouse, Executive Council

## RESPONSES

**b** It was not the intent of Alternative C, the proposed plan, to restore the historic pipe-rail boundary fence between the two cemeteries, although this action was included in Alternative D, the maximum restoration alternative. Alternative C, the proposed plan, has been modified to remove any references to restoration of this pipe-rail fence.

**c** The Park is sensitive to concerns about appropriate uses of the Soldiers' National Cemetery. The draft GMP/EIS calls for enhancement of the interpretation regarding the Cemetery to include more emphasis on the ideals expressed in the design of the Cemetery. These ideals are expressed in several locations in the draft GMP/EIS and they speak to ways to accomplish this including addressing this in the new museum complex and in printed brochures and interpretive materials. The intent is not to increase the volume of interpretive programs in the Cemetery, but rather to refine and broaden the stories told there.

**d** Under all the alternatives described in the draft GMP/EIS, visitors would continue to be able to explore the park on their own or with a licensed battlefield guide.

Little Rock, AR 72205

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr Latschar

This is in response to your letter D18, dated August 14, 1998 which requested public comments on the *Draft General Management Plan and Environmental Impact Statement (GMP)* for Gettysburg National Military Park. I have reviewed the draft plan and I have the following comments and concerns on behalf of the Civil War Round Table Associates:

A. The GMP overall is ambitious and proposes to accomplish much needed restorations, repairs and improvements to the battlefield that are welcomed by the Civil War battlefield preservation community. Positive aspects of the plan are the creation of a consolidated visitor Center that can properly display the artifact collection, Cyclorama, electric map, etc. The restoration of Ziegler's Grove and reinstallation of fencing is very positive as is the removal and addition of wooded areas to reestablish 1863 patterns. Also, the efforts to alleviate traffic congestion and the establishment of a shuttle bus service is much needed

a B. The GMP, unfortunately, is lacking in very important details on the new visitor center in regard to its location, size and its degree of obtrusiveness to the battlefield. From the numerous maps included in the plan, it appears that the proposed site for the new facility is directly east of and necessarily visible from the area near the High Water Mark memorial regardless of provisions for screening. It is near Meade's HQ site and in the impact zone of the Confederate bombardment of July 3rd. If true, then this site selection is very unacceptable. Is it possible to select a better location? A site beyond the south end of the battlefield, for example, would be removed from the area on traditional tour routes and would not contribute to traffic congestion. Also, it would not be an intrusion on the views in the heart of the battlefield and would have the advantage of being a gateway to the battlefield where visitors could be properly oriented before entering. The location proposed by the GMP, in the middle of the park, is somewhat analogous to trying to make sense of a movie that one enters when it is half over.

b C. The GMP does not address how the many changes which it proposes will be funded. The private sector partner will only construct the new visitor center and cash flow from its operation will only cover its debt service. The question arises, how will all the other proposed changes (extensive tree removals, fence construction, shuttle bus service, reconstruction of period structures, etc.) be funded? Since the park has suffered over the years from inadequate funding which has lead to many problems (broken signs, damaged monuments, deteriorated gun carriages, etc.), is it reasonable to expect that funding to make all these much needed improvements will be provided by the congress?

In summary, the GMP proposes needed changes and improvements that the Civil War battlefield preservation community welcomes. However, the location and assumed size of the new visitor center, in the very heart of this hallowed ground, represents a bitter dose of medicine that is very difficult to swallow.

Sincerely,

David F. Gruenewald

CC. Senator Dale Bumpers

## Civil War Round Table Associates

a The proposed museum complex lies below and between the Union battle lines of Cemetery Ridge and Culp's Hill. Although it does not show well on the map on page 125 of the draft GMP/EIS, the topography of the proposed site ensures that the new complex would not present a visual intrusion from any of the key interpretive points of the battlefield, including the High Water Mark memorial or Meade's Headquarters.

b The purpose of the GMP is to define the basic philosophy of park management and provide broad guidance to park managers. A GMP sets direction for resource protection and visitor use actions required to accomplish the park's mission. Park managers use these broad prescriptions to guide the hundreds of smaller decisions that are made over the 10 to 20-year life of the plan. Since availability of specific sources of funds over this time period cannot be predicted, the GMP establishes the goals; it then becomes the responsibility of park managers to seek funds and other assistance from all appropriate sources in order to accomplish those goals.

Cash flow from the non-profit foundation would cover the operations and maintenance costs of the new museum complex, as well as its debt service. As in the past, the park would continue to emphasize the critical role of volunteers, donations, and grants and funds from outside sources as a means of supplementing Congressional appropriations to accomplish the draft GMP/EIS objectives.

## Concerned Citizens of Gettysburg

Mark Rodney Gruin

Greenpoint, Ltd.
1338 East Chocolate Avenue
Hershey, PA 17033 USA

Phone 717.534.1896
Fax 717.533.8829
Email Greenpt@aol.com

16 October, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar:

Attached you will find my review and comments on the draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park.

Please forward any direct responses to me, at the above address.

If any clarification is needed on any of the statements, observations, comments, or questions contained in the attached review and comments, please, feel free to contact me at any time.

Thank you for the opportunity to comment.

Sincerely,

Mark R. Gruin

Received by Terry Deal, NPS

| COMMENTS | RESPONSES |
| --- | --- |

**Review and Comment on the Gettysburg National Military Park Draft General Management Plan and Environmental Impact Statement**
**(Released for Public Comment on 17 August, 1998)**

**Prepared for:**
**Concerned Citizens for Gettysburg**
**Gettysburg, Pennsylvania**
**16 October, 1998**

**Prepared by:**
**Mark R. Gruin**
**Greenpoint, Ltd.**
**1338 East Chocolate Avenue**
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**717.534.1896 phone**
**717.533.8829 fax**
**Greenpt@aol.com email**

**Please address all responses to Mark R. Gruin.**

## TABLE OF CONTENTS

SECTION 1 — EXECUTIVE SUMMARY....2

SECTION 2 — FOREWORD....5

SECTION 3 — THE GENERAL MANAGEMENT PLAN PROCESS AND THE PROPOSED VISITOR CENTER, MUSEUM AND COMMERCIAL SERVICES FACILITIES....8

SECTION 4 — ECONOMIC IMPACT EVALUATION CONCERNS....24

SECTION 5 — HISTORIC ISSUES RELATED TO THE PROPOSED VISITOR AND COMMERCIAL SERVICES COMPLEX....28

SECTION 6 — RESOURCE MANAGEMENT ISSUES....30

SECTION 7 — CONCLUSION & RECOMMENDATION FOR REJECTION....32

LIST OF APPENDICES....33

# COMMENTS

## SECTION 1 — EXECUTIVE SUMMARY

Concerned citizens for Gettysburg, an *ad hoc* coalition of Gettysburg, Pennsylvania area residents, business people, preservationists and others has commissioned an independent review of the Gettysburg National Military Park Draft General Management Plan and Environmental Impact Statement (GMP). This review was commissioned to assist the concerned citizens in complying with the Park's 60-day public comment period — the time allotted for making meaningful and considered public comments on the Plan.

### 1.1 SUMMARY COMMENT

This intensive and comprehensive review has resulted in a significant number of troubling and disturbing findings. There is general agreement that the GMP for Gettysburg National Military Park (GNMP; the Park) was in need of updating. However, the findings, taken together, constitute a substantial adverse impact on the community of Gettysburg, its residents, small businesses and critical tax base. Consequently, concerned citizens are compelled to appeal for a complete rejection of the GMP and the immediate initiation of a new, community-based approach to planning that preserves and builds upon the mutually beneficial relationships that have evolved over the past 135 years.

### 1.2 VISITOR CENTER & COMMERCIAL SERVICES CONCERNS

Among the most pressing issues of concern is the central element of the GMP — a proposed $40,000,000 visitor center, museum, collections storage and commercial services complex to be developed in a precedent-setting public/private partnership within the boundaries of the Park — was completely decided upon immediately prior to the process of up-dating the GMP. No alternatives to this radical proposal were presented. This proposed complex compromises the integrity of the plan in a number ways:

| | |
|---|---|
| a | • Inclusion of the proposed complex in the GMP without allowing for examination of a full range of reasonable alternatives to the proposed development in the GMP violates the spirit of the National Environmental Policy Act. |
| b | • Inclusion of the proposed complex in the GMP without first allowing the GMP to establish the guidelines for development is in direct contradiction to *National Park Service Director's Order 2: Park Planning* (27 May, 1998), Section 3.3.1.2, which calls for general management planning to constitute the first phase of tiered planning and decision making. |
| c | • By allowing the previously-made decision on the proposed complex to drive the GMP process, the Park is in direct violation of NEPA, which specifically prohibits plans to be used to justify decisions already made. |
| d | • The inclusion of substantial commercial service enterprises in the complex is in direct contradiction to *National Park Service Management Policies*, which |



# RESPONSES

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the draft GMP/EIS (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

# COMMENTS

specifically delineate a preference for out-of-park private enterprise by stating, *"If adequate facilities exist or can feasibly be developed by private enterprise to serve park visitors' needs for commercial services outside park boundaries, such facilities will not be expanded or developed within parks.*

e
- The proposed commercial services complex is contrary to and in conflict with the *1990 Gettysburg National Military Park Boundary Legislation*, which was designed to preserve, conserve and protect the historic resources within the boundary area.

f
- The proposed development is in conflict with the findings of the Governor's 21st Century Environment Commission for the Commonwealth of Pennsylvania, which identifies sprawl development as the foremost issue of concern in the Commonwealth for the coming millennium.

a (cont.)
- The failure to address the full range of alternatives for new visitor, museum, collections and commercial service facilities, by limiting the alternatives in essence to "no action" or "the proposed complex," undermines the spirit and intent of the National Environmental Policy Act and National Park Service planning guidelines.

g
- The plans for the complex, including its location, commercial elements and operating scheme will have devastating adverse impact on the local small business community by effectively diminishing the vital pedestrian traffic.

### 1.3 ECONOMIC IMPACT CONCERNS

The Economic Impact Evaluation of the GMP Alternatives, the underlying economic study used to support the decisions presented in the GMP, was itself badly flawed:

h
- The Evaluation was not included in the GMP, but was only released by the Park to comply with a FOIA request.

i
- The Evaluation was presented as an economic impact evaluation of the GMP Alternatives, all of which are resource management alternatives. In fact, the Evaluation studies only two alternatives, neither of which is related to resource management: (1) the "no action" alternative and (2) the proposed visitor center and commercial services complex.

j
- The Evaluation was completed without any primary research. All data was provided to the consultants by the Park and other beneficiary advocates of the "preferred" development alternative.

k
- The Evaluation contains numerous discrepancies and inconsistencies between the basis figures presented by the consultants and the stated operating assumptions used by the Park and its partners.

# RESPONSES

b Inclusion of the proposed museum complex in the draft GMP does not violate NPS policy. The Collections Storage, Museum and Visitor Center DCP was prepared under the existing Gettysburg 1982 GMP. Development Concept Plans are a tool NPS can use to solve facilities concerns. The findings of the DCP were brought into the draft GMP/EIS when it became clear that the public interest could best be served by doing so. The National Parks and Recreation Act of 1978, the law that mandates GMPs for all national parks, requires that NPS indicate the types and general intensities of development. Therefore, inclusion of information regarding the location and size of visitor facilities is appropriate for a GMP.

c Inclusion of the proposed museum complex in the draft GMP/EIS does not violate NPS or NEPA policies. The Collections Storage, Museum and Visitor Center DCP was prepared under the existing Gettysburg 1982 GMP. Development Concept Plans are a tool NPS can use to solve facilities concerns. The findings of the DCP were brought into the draft GMP/EIS when it became clear that the public interest could best be served by doing so.

d The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

l

- The Evaluation did not include a specific comprehensive economic analysis of the Borough of Gettysburg, without which it cannot fully and accurately describe the impacts of the GMP proposals on the local community.

### 1.4 OTHER CONCERNS

In addition, the GMP raises numerous concerns over a wide range of subjects, including but not limited to the following:

m

- The GMP fails to objectively evaluate the historical and archaeological significance of the site proposed for the visitor center complex.

n

- The GMP fails to consider the possibility that the Cyclorama center may be eligible for listing on the National Register of Historic Places.

- The objectivity of the GMP is compromised by a host of ethics, procedural, and review problems.

o

- The Park's failure to pursue appropriate and necessary collections conservation measures has admittedly put the artifact and archival collections at great risk.

p

- The GMP fails to recognize the impact of on-going litigation regarding the Park's deer management program.

### 1.5 DO COMMUNITIES MATTER?

The National Park Service has given clear direction to all of its units — National Parks should, to the maximum extent possible, seek out and consult with local communities and other interested and impacted parties. NPS policy further mandates that public involvement will be adequate to learn about the concerns, issues, expectations and values.

Serious and significant concerns, indications of no support and calls for rejection of the GMP have emerged from Gettysburg Borough, Cumberland Township, the Gettysburg Retail Merchants Association, the Gettysburg Convention and Visitors Bureau, the Gettysburg Battlefield Preservation Association, individual citizens and businesses, and a host of others. Is the Park listening? Do communities really matter to GNMP?

### 1.6 CONCLUSION & RECOMMENDATION FOR REJECTION

The relationship between the Park and the community has been terribly damaged by this General Management Plan and the process pursued in its creation. The process itself has been compromised, rifts in the community have emerged and been manipulated and exploited, and the future of the Park and the community put at unacceptable risk. This GMP should be rejected, and immediate efforts taken to initiate a new approach that seeks to restore the trust and confidence in the Park that has been sadly diminished.

—4—

## RESPONSES

e

NPS management policies call for NPS to provide "appropriate facilities necessary for resource protection and required for visitor enjoyment of parks." (Chapter 9 page 1). In the large majority of natural and historic parks, park lands are utilized for the purpose of providing visitor facilities.

Both NPS and independent historians have reviewed the battle history of the LeVan site and concluded that no significant battle actions took place there. Archeological, endangered species, and wetland surveys have been conducted, to ensure that the site can be developed without impacts to natural or cultural resources. The topography of the site will ensure that the facility would not present a physical intrusion upon the historic landscapes of the park, and would not be visible from any of the primary interpretive areas of the park. Relocating these facilities from their current sites on some of the most hallowed ground of the battlefield will remove major visual intrusions from the heart of the historic battlefield. Therefore, NPS considers that the LeVan tract is an appropriate site for visitor facilities development.

f

NPS does not consider that this project would contribute to urban sprawl. The facilities replace those already in existence, and relocates them not far from their current location.

NPS has proposed significant measures in the draft GMP (pages 76, 91-2) to partner with local communities, particularly the Borough of Gettysburg. These initiatives are intended to improve the interpretation of the town of Gettysburg, its citizens and their role and the battle and its aftermath, and to improve visitor services. NPS has entered into a Letter of Intent with the Borough of Gettysburg to accomplish these initiatives. Proposals include:

- Expand the historic pathway and related media and programs [in downtown Gettysburg]
- Cooperate with local entities to preserve, rehabilitate and interpret the Lincoln Train Station [in downtown Gettysburg]
- Establish a partnership with local governments, the Commonwealth of Pennsylvania and private groups to acquire, preserve, interpret and operate the Wills House
- Establish a NPS presence in downtown Gettysburg

## SECTION 2 — FOREWORD

This independent citizens' review of the Draft General Management Plan (GMP; the Draft) for Gettysburg National Military Park (GNMP; the Park) is being undertaken in response to a sixty day public comment period established by GNMP. The Draft was released to the public on 17 August, 1998 and all public comments must be received by 17 October, 1998 to be considered valid by the administration of GNMP.[1]

### 2.1 WHY THIS REPORT WAS PREPARED

This review was deemed necessary and has been initiated by an *ad hoc* coalition of Gettysburg area citizens and business people, who are concerned citizens for Gettysburg (CCG). These people are acting out of a combination of concern over the impacts of the proposed developments and activities delineated in the GMP, and a lack of faith based upon recent experience regarding the administration of GNMP, its practices and its motives. Despite attempts by GNMP and others to paint the CCG as a small group of malcontents and negativists, the fact is that the CCG represents a broad cross-section of local residents and business people with the best interests of both the park and the community in mind, and includes as active participants private citizens, retirees, and representatives of the business community, local government, retail merchants association, convention and visitors bureau, civil war and battlefield enthusiasts' organizations, preservationists, academics, farmers, and others.

### 2.2 REPORT PREPARED BY MARK GRUIN OF GREENPOINT, LTD.

The review and comment has been prepared by Mark Gruin, President and Principal Consultant of Greenpoint, Ltd. of Hershey, Pennsylvania. Greenpoint is an independent consulting concern specializing in parks and protected area management issues. As President, Mr. Gruin has provided planning, evaluation and other project consultation services to conservation organizations, concerned government agencies and bodies, citizens groups and private sector enterprises around the world, including work in the United States, the United Kingdom, Tanzania, Belize, Jamaica, the United States Virgin Islands, Guyana, St. Lucia, Dominica and Tobago.

[1] It should be noted that, given the amount of information in the Draft GMP and the implications of its implementation, an extension of the public comment period was requested by a number of parties, including United States Senator Arlen Spector, United States Representative William Goodling, the Gettysburg Borough Council, and others. These requests were denied by the Superintendent of Gettysburg National Military Park.

- Develop, in coordination with local entities, an active menu of programs, interpretation, living history and tours to educate visitors about the Gettysburg's role in the battle, its aftermath and the preservation of the battlefield.
- Provide information in the park's museum complex about the town of Gettysburg, the historic pathway, and other sites, along with information about local and regional visitor services (hotels, restaurant, etc.)
- Work with the community and private entities to provide regular shuttle service between the museum complex and downtown Gettysburg.
- Incorporate the community in the park's auto tour.

These activities, combined with actions described elsewhere to limit additional development on Baltimore Pike, should not encourage additional sprawl.

g The draft GMP/EIS acknowledged that the relocation of park visitor facilities might change visitor spending patterns and create indirect effects on area development or individual businesses (pg 246). The impact of the alternatives on pedestrians were considered, and, at the request of the Borough of Gettysburg, actions to mitigate possible effects were incorporated into the plan alternatives. These actions include: NPS partnership in the development of the Wills House; an NPS ranger presence downtown; strengthening the historic pathways project; expansion of NPS' auto tour to include downtown Gettysburg; inclusion of a downtown/NPS visitor center shuttle; continued promotion of local visitor services by the VCB in the park visitor center; and routing of the auto tour along Steinwehr Avenue. NPS and the Borough of Gettysburg have signed a Letter of Intent to begin development of interpretive planning for these activities, and they were included in the draft GMP/EIS. NPS believes that these actions will strengthen the historic district, enhance pedestrian use of the area and improve the visitor experience.

The impact of these actions was considered in the economic analysis, which predicts an overall positive impact on the local economy and tourism as a result of the action alternatives proposed in the draft GMP/EIS. That analysis indicates that the proposal would have a positive impact on the local economy.

## COMMENTS

### 2.3 A CALL FOR MUTUALLY BENEFICIAL, SUSTAINABLE DEVELOPMENT

It is important to note that, in general, the CCG recognizes and supports the need to update the GMP for Gettysburg National Military Park, and agrees with and supports the position that such a plan should be resource-driven, in keeping with the mission of both the National Park Service (NPS) and GNMP. The CCG is not opposed to change, but, like many others, is interested in the management of GNMP in such a way that provides lasting and sustainable benefit to all interested and affected parties and peoples, especially the visitors to Gettysburg.

### 2.4 RECOGNITION OF NPS FISCAL CLIMATE

The CCG also recognizes the fiscal climate under which all parks, including GNMP, are struggling. This has been well documented, and while some of the details may be arguable, the fact remains that funding for all NPS units is very competitive and very tight, especially for new facilities and other capital projects. On the other hand, it should also be noted that in the past eight years GNMP has neither requested nor accepted additional funds from Congress to address growing concerns over its ability to properly maintain its historical artifact and archival collections, and has not requested nor accepted any capital funds for facilities improvements or the design and construction of new facilities. q

### 2.5 THE VISITOR EXPERIENCE AND ITS IMPACT AT GETTYSBURG

The CCG understands full well the problems, pressures and opportunities related to GNMP. As citizens and business people the group shares all of these with the Park. Visitors come to the Park, but they also come "to Gettysburg," to this small and historic community of 8,000 citizens in rural Adams County, Pennsylvania. These visitors patronize businesses, contribute to the tax base, use streets and other public services. The quality of the visitor experience here, and ultimately their decision as to whether or not to return, is the responsibility of all. Working in concert, in an atmosphere of mutual trust and benefit and with a plan that supports such an atmosphere, the CCG believes is the best way to achieve a quality visitor experience and preserve the very special national resource that is Gettysburg National Military Park.

### 2.6 GETTYSBURGIANS FIRST TO PRESERVE THE BATTLEFIELD

In fact, it was the citizens of the community of Gettysburg that first established Gettysburg Park in 1863, around the new National Cemetery and the site of Lincoln's Gettysburg Address. In 1864 the Commonwealth of Pennsylvania chartered a non-profit corporation (the Gettysburg Battlefield Memorial Association) to manage the Park. Recognizing the national significance of the Cemetery and the Battlefield, the Department of War assumed responsibility for the Park in 1895. The National Park Service became the official stewards for the Gettysburg National Military Park and the National Cemetery in 1933.

## RESPONSES

h The Economic Impact Evaluation, prepared by the Office of Thomas J. Martin, was released to the public on August 17, 1998, at the same time the draft GMP/EIS was released. Copies of the report were distributed to interested individuals during a detailed presentation on the findings of the report at a public workshop on September 10, 1998. Copies were provided upon request to any interested individual throughout the comment period and are still available from the park.

In July 1998, the park received a Freedom of Information Act Request for all consultants' reports related to the draft GMP/EIS. The Economic Impact Evaluation and other reports were not yet completed at the time of the request. However, on August 17, 1998, the day the draft GMP/EIS was released to the public, the reports were provided to the requester. On this date the report was also provided to the press and made available to any member of the public who requested it.

i The economic assessment considered the actions associated with each alternative, including resource management and interpretive proposals, as well as those associated with visitor use. This is the reason that there are differences in the economic impact of the three action alternatives. These differences are noted in the text in Chapter 4, but can be readily compared in the chart on page 162 of the draft GMP/EIS.

j Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP/EIS and the 12 meetings on the draft DCP, as were representatives of local municipalities. Appendix 10 indicates local business and municipal attendance at these public meetings. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5

**2.7 INTRODUCTION TO THE GENERAL MANAGEMENT PLAN REVIEW**

The following review presents a range of comments on the Draft GMP and its specific issue areas. Many of the issues are quite specific, while others are more general or relate to proposed programs or initiatives that cut across issue areas and have more sweeping effect. Chief among these is the area of greatest concern so far — the proposed new Visitor Center, Museum and Commercial Services facility. In keeping with the required format, discussions that follow will try to include summary questions to which the administration of the Park can respond directly.



lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

**k** NPS is unaware of such discrepancies or inconsistencies.

**l** NPS defined the area affected by the proposed alternatives as the communities within which the park is located and those that are adjacent to it. Visitor facilities within the park are located in five townships, and commercial services for tourists are located in these townships, adjacent townships and the Borough of Gettysburg. For this reason, the economic assessment incorporated all of the communities that might be affected by the alternatives incorporated in the draft GMP/EIS.

NPS discussed the affected area it felt was appropriate during public scoping and resource workshops. During the various public workshops, NPS was asked to consider the impacts of the proposal on specific segments of the tourism economy, and this was done. However, NPS was not asked to perform separate economic assessments during these scoping meetings.

The draft GMP/EIS notes that although some individual businesses may be affected by the proposal, the overall economic impacts from the action alternatives on the economy of the affected area are positive. Therefore, NPS does not believe that a separate analysis of the economic impact from the proposal on the Borough of Gettysburg would provide additional useful information.

## COMMENTS

### SECTION 3 — THE GENERAL MANAGEMENT PLAN PROCESS AND THE PROPOSED VISITOR CENTER, MUSEUM AND COMMERCIAL SERVICES FACILITIES

There is great concern that the GNMP Draft GMP is badly and irreparably flawed. Central to this observation is the fact that the process of drafting and presenting the GMP has progressed with a predetermined visitor and commercial services facility as its central element. This approach reverses and is contrary to the NPS policies calling for the creation of a GMP first, that allows for proper consideration of all alternatives. While the GMP is (rightly) supposed to have at its core a resource management plan, and to present alternatives to resource management for consideration and decision making, it does not lay the foundation for considered alternatives to the location, size and operating elements of a new visitors services facility or facilities. To the contrary, it presents a visitor center and commercial services plan in complete and incontestable form, developed concurrently with the Draft GMP and in fact driving the GMP process.

#### 3.1 GMP APPROACH IS CONTRARY TO NPS STANDARDS AND POLICIES

This approach, and the process under which this draft GMP was initiated, is in serious contradiction to Park Service standards and policies, and in fact to any sensible master planning approach. As generally understood, General Management Plans are created and updated to provide broad direction and guidance for all aspects of a Park's operation and development for a period of 15 to 20 years, with a focus on resource management. According to the National Park Service, a GMP is intended to delineate the necessary approaches to achieving the mission and mission goals of the unit, to suggest a range of alternatives that can be pursued in the pursuit of such achievement, and to recommend one of the alternatives as a preferred direction. Once a GMP has been approved, more specific management plans for individual elements of a Park's operation are to then be developed to flesh out and pursue the broad directional guidelines established by the GMP. These more specific plans can and do include Commercial Services Plans, Development Concept Plans, and Resource Plans.

##### 3.1.1 NPS Director's Order Number 2: Park Planning

This opinion is supported by, and in fact has been gleaned largely from, the NPS document known as *National Park Service Director's Order 2: Park Planning*, with the effective date May 27, 1998. It says in part, in Section 3.3.1.2:

> *"General management planning will constitute the first phase of tiered planning and decision making. It will focus on why the park was established and what resource conditions and visitor experiences should be achieved and maintained over time."*

## RESPONSES

**m** The draft GMP/EIS described the general process that was used by NPS historians to document and determine the integrity and significance of the battlefield and commemorative landscapes. The site of the proposed museum complex was included in this overall assessment and was treated objectively, as were all other park landscapes. Furthermore, NPS used primary historic sources to develop an additional narrative overview of the proposed site. Results of this research were subject to peer review from non-NPS historians, who generally agreed with the assessments of the site. Moreover, the Gettysburg National Battlefield Museum Foundation independently undertook an archeological testing and evaluation of the site, in consultation with the State of Pennsylvania, to determine its eligibility for National Register purposes. No sites eligible for listing on the National Register of Historic Places were documented.

**n** On September 24, 1998 (40 days after the draft GMP/EIS had been released for public review) the Keeper of the National Register of Historic Places determined that the Cyclorama Building was eligible for listing in the National Register of Historic Places. The document has been revised to reflect this determination.

**o** Between 1993 and 1999, the park has spent over $703,500 in NPS operating funds to improve storage conditions and preserve archival and curatorial collections. Work accomplished has included backlog cataloging for archival and artifact collections, completion of a Collection Management Plan and a Collection Storage Plan, rehousing of artifacts and archival materials (i.e., in acid-free storage containers), purchase of additional museum storage cabinets and shelving, expansion of the artifact storage area, upgrade of the museum storage intrusion alarm system, installation of a fire suppression system in both the storage area and exhibit area, and improvements to heating and air conditioning systems in the museum exhibit area.

**p** The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the draft GMP/EIS are the same as those approved in 1995. The objective is to maintain the density of white-tailed deer at Gettysburg National Military Park and Eisenhower National

The policy here is clear — broad planning and development guidelines are to be established first, with specific development and implementations to follow that are consistent with the guidelines and objectives set by the GMP.

### 3.2 CHRONOLOGY OF CONFUSION

This issue has been confused at every turn by the Park. In April, 1996 a **draft** Collections Storage, Museum and Visitor Center Development Concept Plan/Environmental Assessment (DCP/EA) was released for public review. Based on this draft DCP, a Request for Proposal was formulated and issued, and in November of 1997 a proposal (from Robert Kinsley of York, Pennsylvania) was selected for further negotiation. Then, according to entries in Chapter 5 of the draft GMP, in May of 1998, a notice of termination of the Environmental Assessment process for the development concept plan and draft environmental assessment for the proposed facilities was published in the Federal Register. The purpose of this notice was to inform the public that the issues involved would be "incorporated into a park-wide general management plan/environmental impact statement." For an as-yet-undetermined reason, the notice was apparently never published.

Presumably, this means that a decision was made to examine the issues involved with the visitor center, museum and collections storage facilities, including their location and commercial elements, in the context of an overall examination of the Park's general management plan. Meaning that the guidelines for making development decisions, and the examination of alternatives, would be completed first (the GMP), followed by detailed development of specific concepts and plans (the DCP/EA), as described in *Director's Order 2* referenced above.

Unfortunately, this entire process has resulted in a great deal of confusion, and begs several questions.

r Question 3.1: Why was an RFP formulated and issued based on a **draft**, rather than a completed, DCP? Why were bids accepted, and a successful bidder selected, based on an RFP that was prepared only on a **draft** DCP? Why was the affected public not informed that the draft DCP/EA was being terminated and the issues involved with the collections storage, museum and Visitor Center facilities were to be incorporated into the draft GMP? If the issues were to be incorporated into the draft GMP, why were alternatives to the preferred development alternative indicated in the draft not presented for examination or discussion in the draft GMP?

In fact, it appears that few, if any, of the issues examined in the DCP/EA were in fact incorporated into the draft GMP.





Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/Environmental Impact Statement (FWDMP/EIS) and draft GMP/EIS would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a lawsuit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white tailed deer management program was reinstituted at the park 14 days later. The Plaintiffs have appealed the ruling and the matter is currently pending.

q Gettysburg National Military Park requested line-item construction funds in 1985, 1990 and 1993 to correct some of the life safety, accessibility and building deficiency concerns of the current visitor center and Cyclorama buildings. In 1996, the park requested line-item construction funds for the complete rehabilitation of both structures. However, neither request successfully competed against the estimated $5.6 billion maintenance backlog of the NPS on a national basis, and consequently neither request was included in NPS' service-wide construction priority list. Therefore, the President has not formally requested any funds from Congress for rehabilitation of these park buildings, as part of the Administration's budget request.

Between 1993 and 1999, the park has spent over $703,500 in NPS operating funds to improve storage conditions and preserve archival and curatorial collections. Work accomplished has included backlog cataloging for archival and artifact collections, completion of a Collection Management Plan and a Collection Storage Plan, rehousing of artifacts and archival materials (i.e., in acid-free storage containers), purchase of additional museum storage cabinets and shelving, expansion of the artifact storage area, upgrade of the museum

**3.3 COLLECTIONS STORAGE ISSUES NOT PRESENTED FOR EXAMINATION IN THE GMP**

Unfortunately, the issues on the collections storage, museum and Visitor Center facilities have not been examined in the context of the GMP. They were simply presented as a finished product, a "done deal," with no discussion of alternatives. No DCP/EA was ever completed, and it appears that none ever will be completed. As a result, the decided-upon public/private development of visitor, collections and commercial services facilities drives the GMP and its findings, in reverse of the approach dictated by Park Service policy.

**3.4 ACCEPTED GMP DEVELOPMENT PROCESS SUBVERTED**

With the Draft GMP for GNMP, the NPS planning process, which requires that specific implementation programs and initiatives be developed after, and in response to, the General Management Plan, has been clearly reversed and blatantly subverted. In the case of GNMP, an RFP was formulated and published based on an incomplete (and later terminated) Development Concept Plan for a new visitor center, museum and commercial services complex, which includes administrative and support functions, all in one central facility. Bids were received, and a developer was selected immediately prior to, and to some extent at the same time as an updated GMP was being prepared.

This puts the entire process and its findings and recommendations at serious risk. By inserting a previously-arrived-at decision (regarding the development of the visitor center/museum complex, with its commercial elements) into the GMP process, any thorough and reasonable examination of development alternatives for such activities and elements has been short-circuited. This eliminates examination and consideration of development alternatives from the GMP, and imposes the visitor center complex decision on the resource management alternatives presented in the GMP. In effect, the resource management alternatives are then falsely presented as depending upon pursuit of the proposed visitor center development in concert with a private commercial developer.

This is contrary to what was stated in a public workshop by GNMP Staff. When asked if the resource management alternatives depend only upon the removal of existing infrastructure from the area in and around Ziegler's Grove, or upon the removal and *relocation to the proposed site (the LeVan Farm)*, GNMP Chief of Resource Management conceded that only the removal of existing infrastructure from Ziegler's Grove was the key, and that the resource management objectives could be realized without the proposed facility in its proposed location. This position is more in keeping with the spirit of the Park Service's general management planning parameters and policies, in which resource management alternatives and decisions should stand alone as the primary direction-setting considerations in the general management planning process. Sadly, the Draft General Management Plan and its development do not reflect such a resource management-driven approach as it primarily pertains to the visitor center and commercial services project.



storage intrusion alarm system, installation of a fire suppression system in both the storage area and exhibit area, and improvements to heating and air conditioning systems in the museum exhibit area.

r Documents are completed only when NPS makes a decision and all compliance is final. The *Request for Proposals, Visitor Center and Museum Facilities, Gettysburg National Military Park*, December 11, 1996 describes the environmental compliance procedure on page 33. It noted that although the NPS draft DCP included an overview of the potential environmental impacts of a proposal, NPS would reevaluate environmental issues once the exact location of the proposal and the exact nature of the proposal were known. NPS indicated that if the selected site was within park boundaries but not within an approved development zone under the 1982 GMP, that the GMP would be considered for amendment through the usual environmental planning procedures. The findings of the draft DCP and the RFP process were brought into this draft GMP/EIS when it became clear that the public interest could best be served by doing so.

The public was notified that this was happening in a newsletter dated January 4, 1998 and mailed to about 3,800 people. The public was also notified of this in public meetings held in December 1997 and March 1998. The draft GMP/EIS discusses the process on pages 22-25 and in Chapter 5, Consultation and Coordination.

NPS developed a reasonable range of alternatives during the draft Development Concept Plan/Environmental Assessment. In it, NPS developed and reviewed with the public four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. NPS considered public comment, and the proposal included in the draft GMP/EIS reflects changes made because of public comment. NPS considers that the environmental review procedures followed in this matter, including the consideration of public comment as a part of the process, comply with NEPA.

s Question 3.2: How is the process followed in the development of the draft General Management Plan for Gettysburg National Military Park consistent with the National Park Service Policies described in Director's Order 2: Park Planning, Section 3.3.1.2? Would it not have been more appropriate to completely halt and delay any work and decisions on new visitor, collections and commercial services facilities until the GMP was completed and accepted, and then to generate a new DCP, followed by a new RFP, that emerged from and followed the guidelines established by the GMP?

### 3.5 NO ALTERNATIVES TO VISITOR CENTER & COMMERCIAL SERVICES COMPLEX PRESENTED IN THE GMP

The fact that no alternatives to the proposed visitor and commercial services complex are presented for discussion and review is cause for concern. One would assume that the Park's notice of termination of the DCP/EA and stated intention to incorporate the issues related to the complex into the GMP would mean that all of the visitor and commercial services issues would be re-examined in light of the GMP. This would include a range of alternatives for visitor-related facilities development: a range that could include but is certainly not limited to the following examples:

- Restore and refurbish existing facilities.
- Construct new visitor-related facilities in the same general area that is currently being used for the visitor center/museum and Cyclorama, thus retaining the focus of visitor orientation and interpretation activities in the core of the park and still within walking distance of related out-of-park commercial services.
- Develop satellite interpretive facilities in the heart of the Borough of Gettysburg.
- Make adaptive reuse of existing buildings in the Borough of Gettysburg for archival and artifact collections storage and management facilities.
- Pursue a cooperative initiative with the existing commercial district to beautify the commercial strip.

Some alternatives were presented in the terminated DCP, including some of those presented above. However, the selection that resulted was not done in the context of the updated GMP and all of its scrutiny and ramifications. The alternative selected was driven primarily by a response to an RFP. Furthermore, it was driven by the proposer, rather than representing a comprehensive approach that has the best interests of the community as part of its guiding principles.

t Question 3.3: Why were development alternatives for visitor center, museum, collections storage, administrative, and commercial services facilities not examined either as part of the GMP, or after the GMP has been completed?

s Inclusion of the proposed museum complex in the draft GMP is appropriate. The Collections Storage, Museum and Visitor Center DCP was prepared under the existing Gettysburg 1982 GMP. Development Concept Plans are a tool NPS can use to solve facilities concerns. The findings of the DCP were brought into the draft GMP/EIS when it became clear that the public interest could best be served by doing so.

t Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the draft GMP/EIS (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work

### 3.6 DIRECTOR'S ORDER #2 REGARDING NEPA AND NHPA

Director's Order 2 goes on to recognize the need for consistency with and adherence the National Environmental Policy Act and the National Historic Preservation Act by stating, in Section 3.3.1.6:

> *"The analysis of GMP alternatives will meet the program standards for NPS implementation of the National Environmental Policy Act (NEPA) and related legislation, including the National Historic Preservation Act (NHPA). An environmental impact statement (EIS) will be prepared for general management plans."*

The reference here to NEPA is especially important. Of particular relevance is a fundamental parameter of NEPA which prescribes that Environmental Impact Statements cannot be used to justify decisions already made: Paragraph (a) of Section 1500.7 (Preparing Draft Environmental Impact Statements) of the National Environmental Policy Act Appendix E — Preparation of Environmental Impact Statements: Guidelines (38 Federal Register 20550-20562 (1973)) states,

> *"...agencies should keep in mind that such (draft environmental) statements are to serve as the means of assessing the environmental impacts of proposed agency actions, rather than as a justification for decisions already made. This means that draft statements on administrative actions should be prepared and circulated for comment prior to the first significant point of decision in the agency review process."*

According to NEPA, any approach that seeks to use an EIS to justify decisions already made is wrong, and violates the spirit and the letter of the process. It appears that this is exactly what is taking place with the GNMP Draft GMP as it relates to the visitor center/museum complex — that the GMP and its accompanying Environmental Impact Statement (EIS) have been developed primarily to support a previously made decision to pursue the development of a visitor center, museum and commercial services complex in a site selected not by the Park service but by a private developer.

u Question 3.4: How is the draft GMP/EIS consistent with the National Environmental Policy Act as it relates to requiring that environmental impact statements not be used as justification for decisions already made?

### 3.7 RAMIFICATIONS OF THE FLAWED GMP PROCESS

Of most serious concern to residents and business people in Gettysburg and the Borough of Gettysburg are the ramifications of this flawed GMP process. The proposed visitor center, museum and commercial services complex includes two very significant adverse impacts — its commercial elements compete directly and unfairly with existing local small businesses providing the same services, and its proposed location removes the vital



to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

u Inclusion of the proposed museum complex in the draft GMP/EIS does not violate NPS or NEPA policies. The Collections Storage, Museum and Visitor Center DCP was prepared under the existing Gettysburg 1982 GMP. Development Concept Plans are a tool NPS can use to solve facilities concerns. The findings of the DCP were brought into the draft GMP/EIS when it became clear that the public interest could best be served by doing so.

v The book and museum store, licensed battlefield guide tour center and food services incorporated within the proposed new museum complex are necessary and appropriate visitor services. NPS management policies permit necessary and appropriate visitor services within parks if they meet visitor interpretive and use needs, enhance the use and enjoyment of the park without resulting in impairment of park values, and can be located where the least impact on park resources and values will occur. In this case, the provision of an expanded book and museum store, food service and a center for tours led by licensed battlefield guides meet NPS management policies for appropriate and necessary services. The park would also provide for-fee interpretive programs in the center, including the electric map, a cyclorama program, and a film.

NPS evaluated the impact of the book and museum store, limited food service, licensed battlefield guide tour center and for-fee interpretive programs, along with the other changes proposed in the draft GMP/EIS alternatives, on the local tourist economy. The analysis found that there would be positive impacts on local businesses. Although NPS estimated that more dollars would be captured by the proposed facilities than are captured in the existing visitor center facilities, local businesses located outside of the park boundaries would also benefit. For example, in Alternative C, although in-park expenditures would rise from $3,233,775 in 1996 to $8,730,700 in 2007,

## COMMENTS

pedestrian traffic from the core commercial district. These two major issues have broad and sweeping negative and adverse impact. The proposed development, and its inclusion as a *fait accompli* in the General Management Plan...

| | |
|---|---|
| v | • Results in an unacceptably negative impact on the local economy and the already stressed tax base of the Borough of Gettysburg by establishing a significant commercial entity inside the Park, outside the Borough and away from the core commercial district in the Borough of Gettysburg that unfairly competes against existing small local businesses. |
| w | • Results in an unacceptably negative impact on traffic patterns in and around the Park, forcing traffic into dedicated funnels and gauntlets. While the traffic management strategies presented in the GMP and its supporting Traffic Studies propose to mitigate this impact partly through the use of a shuttle system, no funds are dedicated for such a system. What is proposed is to establish new traffic patterns that place new burdens on old roads. The driving force behind these decisions appears to be an attempt to maximize traffic, traffic capture and length of stay in the proposed new complex for competitive commercial reasons, and not to create the best experience for the visitor. |
| x | • Imposes a major new structure on what historian's have identified as the last pristine ground on the battlefield, which will have an unacceptably negative impact on the viewshed of the battlefield and its surrounds. While valid arguments have been made that many structures that have been built over the past 100 years have contributed to a denigration of the viewshed, the obvious question follows — how will the construction of a major new building and facilities complex on previously undisturbed ground contribute positively to the preservation of the viewshed? |
| y | • Works at cross purposes to the stated resource management objectives, compromising the integrity of the battlefield. In fact, it appears that the importance of the Ziegler's Grove area to the interpretation of the battle has been over-stated in the GMP. This strategy suggests an attempt to further the agenda of removing the existing facilities and constructing new facilities nearly one mile away from the pedestrian commercial core of Gettysburg. |
| z | • Isolates the National Cemetery from easy pedestrian access, further denigrating the integrity of the site as it relates to the establishment of the Cemetery and its importance to the area as a memorial to the human sacrifices which contributed so mightily to the preservation of the Union. |

Individually, each of these is cause for concern and re-examination. Taken together, they constitute an impact on the quality of life in the region and on the experience of the visitors to Gettysburg that cannot be quantified, but has at least the potential to be decidedly negative in all respects.



## RESPONSES

tures in the community would also rise, from $112,850,385 in 1996 to $137,129,300, or 21.5%, in 2007. In other words, Alternative C would generate almost $30 million dollars in additional visitor expenditures and more than $24 million dollars of that would go to local commercial businesses outside of the park's boundaries.

w You are correct that no costs were included for the proposed shuttles. The cost estimates have been modified to include these costs. The purpose of the proposed shuttle and traffic management system would be to allow the park to better manage traffic congestion and improve the visitor experience. NPS' analysis of traffic impacts does not consider that traffic impacts are "unacceptably negative," although there would be some changes in how vehicular traffic is distributed. A discussion of these impacts for each alternative is included in Chapter 4 of the draft GMP/EIS.

x Although the property selected for the proposed museum complex has been relatively undeveloped since the battle, the role that it played in that battle was minor. Aside from temporary use by several Union batteries, there was little activity other than troop movement across it. The site selected for the museum complex would not interfere with historic fields of fire or viewsheds that affected the outcome of the battle, and would not include any military features that were used or created by the armies for battle purposes. It is anticipated that efforts by the Gettysburg National Battlefield Museum Foundation and NPS would enhance significant historic views and preserve any historically important features on the larger tract that encircles the complex site. Relocation of the visitor services function from the Union center to the Union rear would help the park rehabilitate historically significant views and battlegrounds that affected the outcome of the battle.

y The draft GMP/EIS describes the process by which NPS historians documented and determined the significance of battlefield and commemorative landscapes. The site of Ziegler's Grove was included in this assessment. The significance of the site was also researched and documented as part of the Determination of Eligibility for the Cyclorama Center. As a result of these efforts, NPS prioritized the park's resources according to how each contributed to the outcome of the battle and the history of the park. Because Ziegler's Grove was assessed as part of the Major Battle Action Area of the battlefield,

## COMMENTS

### 3.8 IMPACT OF PROPOSED VISITOR CENTER & COMMERCIAL SERVICES FACILITIES

In the current context, some of the economic impact issues related to the development of the proposed complex are particularly worrisome, and deserve more attention. Attempts have been made by the current administration at GNMP to portray anyone that voices any concern (interpreted as opposition) to the proposed development as either ignorant and naive, without understanding of the needs, or against change. In fact some of the Park's resource management agenda is valid and exemplary. The notion of creating a new visitor center and museum complex and new collections management facilities to house the collections and provide interpretive and educational services has merit. The fundamental concept of a public/ private partnership to assist in the creation of such facilities also has merit. What does cause great concern among Gettysburgians is the pursuit and accomplishment of these ideals at the expense of a viable, existing commercial district in the Borough.

### 3.9 THE CORE

This core commercial district has emerged over the course of the past 135 years, concurrent with the development and evolution of the Park and in response to the rising numbers of visitors to Gettysburg, and the needs of those visitors for food, lodging, entertainment, information, education, souvenirs and gift items. By virtue of the services they provide to battlefield visitors, the businesses in this core district have established an informal, *de facto* partnership with the Park to provide a range of visitor services. These services include not only commercial services, but open parking utilized by visitors walking to the Park and a range of informational and interpretive assistance. These existing informal partnerships may be destroyed with the implementation of the proposed plan.

aa Currently, the core commercial district includes at least 104 small to medium-sized businesses operating within two-fifths of a mile of the current visitor center and National Cemetery. This distance is not arbitrary or accidental, but represents comfortable walking distance for the majority of visitors to the Park. Pedestrian traffic is vital to the core commercial district. Any attempts to relocate the visitor complex and manipulate visitor movement patterns to eliminate this pedestrian traffic to the commercial district would have serious adverse impacts on this very important segment of the local economy.

### 3.10 COMMERCIAL ELEMENTS OF THE PROPOSED FACILITIES

Much has been made of the reduction in size and scope of the proposed visitor center complex in response to expressed concerns. While these have made some difference, they have not even come close to addressing the real problems, which are the relocation of the visitor center complex itself and the continued inclusion of commercial elements that duplicate and seek to compete with those offered currently in the community.



## RESPONSES

visitor use facilities at that location were inappropriate and intrusive. NPS believes that locating major visitor facilities anywhere within the Major Battle Action Area is inappropriate.

z Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new Visitor Center to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

aa The draft GMP/EIS acknowledged that the relocation of park visitor facilities might change visitor spending patterns and create indirect effects on area development or individual businesses (pg 246). The impact of the alternatives on pedestrians were considered, and, at the request of the Borough of Gettysburg and others who attended public workshops, actions to mitigate possible effects were incorporated into the plan alternatives. These actions include: NPS partnership in the development of the Wills House; an NPS ranger presence downtown; strengthening the historic pathways pedestrian environment; expansion of NPS' auto tour to include downtown Gettysburg; inclusion of a downtown/NPS visitor center shuttle; continued promotion of local visitor services by the Visitors and Convention Bureau in the park visitor centers; and routing of the auto tour along Steinwehr Avenue. NPS and the Borough of Gettysburg have signed a Letter of Intent to begin development of interpretive planning for these activities. NPS believes that these actions would strengthen the historic district, enhance pedestrian use of the area and improve the visitor experience.

The impact of these actions was considered in the economic analysis, which predicts an overall positive impact on the local economy and tourism as a result of the action alternatives proposed in the draft GMP/EIS. That analysis indicates that the proposal would have a positive impact on the local economy.

Unfortunately, semantics regarding the commercial elements of the proposed visitor center and commercial services facilities have been used to obscure the facts: a movie theater that seats 225 people is being proposed; a 300-seat eating facility is being proposed; a tour bus center is being proposed; and, a significant expansion of the current book/gift shop is being proposed. These represent new and, in the case of the book and gift sales shop expanded commercial enterprises that will be built on some of the last untouched land on the battlefield, and that will compete directly with small business enterprises in the area that have been providing these services for many decades.

### 3.11 CONFLICT WITH 1990 BOUNDARY LEGISLATION

The 1990 Legislation which addressed and set the boundaries of Gettysburg National Military Park was promoted as legislation that would forever preserve, conserve and protect the hallowed grounds of the Park, its battlefields, monuments, National Cemetery and other important sites and elements. The legislation resulted in the establishment of boundaries for the Park which included, and still include, private land that was deemed to be of historic significance, in part through the creation of a Gettysburg Battlefield Historic District. This has created a burden on private landowners, limiting what they can and cannot do in terms of making changes to or developing their land. In addition, the Act requires that any Federal or federally assisted undertaking in the historic district be consistent to the maximum extent possible with the preservation purposes of the district.

Subsequent action taken regarding three controversial projects — the Yingling Auction House, the Railroad Cut, and the proposed Fantasyland development — reinforced, after contentious debate and costly litigation, the notion that it was in fact the Park's on-going intention to preserve, conserve and protect the lands within the district. As a result, the Park's decision to pursue the proposed $40 million visitor center, museum and commercial services complex has come as a shock to many, as this appears to be a complete reversal on how the issue of development within the historic district would be controlled and allowed to progress.

It appears that the proposed complex is contrary to and in direct conflict with the 1990 Boundary Legislation, as it proposes significant construction and development on a site that has remained undeveloped since at least 1863 (see Figure 1, page 16). This goes against both the spirit and the language of the legislation — to preserve, conserve and protect the historic resources of the battlefield.

bb Question 3.5: How is the proposed visitor center, museum, collections storage and commercial services facilities complex consistent with the 1990 Gettysburg National Military Park Boundary Legislation?





bb NPS management policies call for NPS to provide "appropriate facilities necessary for resource protection and required for visitor enjoyment of parks." (Chapter 9 page 1). In the large majority of natural and historic parks, park lands are utilized for the purpose of providing visitor facilities.

Both NPS and independent historians have reviewed the LeVan site and concluded that no significant battle actions took place there. Archeological, endangered species, and wetland surveys have been conducted, to ensure that the site can be developed without impacts to natural or cultural resources. The topography of the site will ensure that the facility would not present a physical intrusion upon the historic landscapes of the park, and would not be visible from any of the primary interpretive areas of the park. Relocating these facilities from their current sites along some of the most hallowed ground of the battlefield would remove major visual intrusions from the heart of the historic battlefield. Therefore, NPS considers that the LeVan tract is an appropriate site for visitor facilities development.

## COMMENTS

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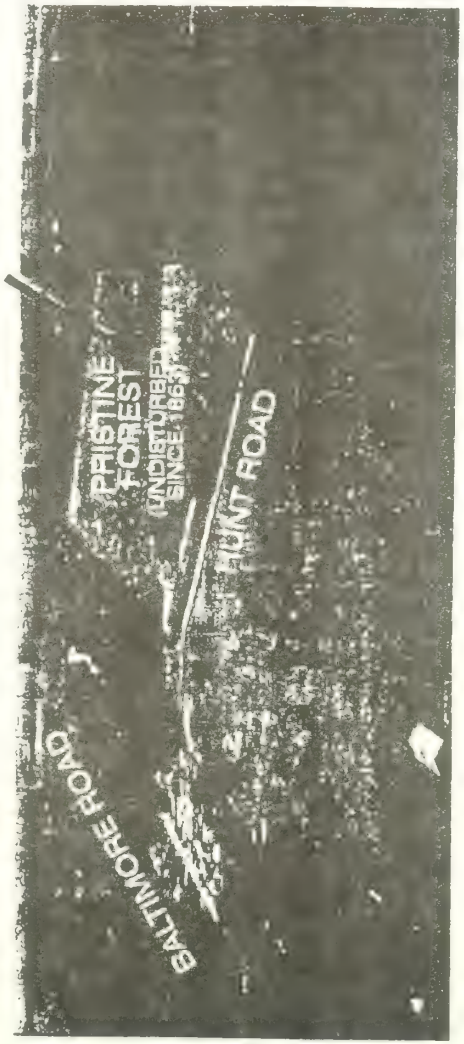


Figure 1

## RESPONSES

cc The part of the LeVan tract being considered as the location for the proposed museum complex is indicated in Figure 22 of the draft GMP/EIS. That area was primarily open ground both at the time of the battle and in 1895 and 1927 as can be seen in Figures 3, 4 and 5 of the draft GMP/EIS. Given the nature of woodland progression in this climate, almost continuous grazing or crop cultivation must have taken place on this tract between 1863 and 1927 for it to have remained open. An aerial photo taken in the 1930's also indicates that this area was primarily open, with woods along the southern boundary of the tract near the intermittent stream.

### 3.12 SPRAWL DEVELOPMENT AND THE 21ST CENTURY ENVIRONMENT COMMISSION

The 21st Century Environment Commission was created by Pennsylvania Governor Tom Ridge on 1 July, 1997 to examine, debate and identify the most pressing environmental problems in the Commonwealth for the coming millennium, and to make recommendations as to how these problems might be addressed. After a year-long process, the Commission, composed of 40 members representing a broad cross-section of business, community, environmental and government concerns, released their report to the Governor on 15 September, 1998.

The final report identified some 240 issues of concern. It identified sprawl development as the first and foremost socio-environmental problem facing the Commonwealth. The Commission recognized the damage that sprawl development causes to the environment (by consuming previously undeveloped or lightly developed agricultural lands, woodlands, wetlands and other natural areas), to local economies (by creating economic competition to existing businesses in small towns and communities, driving existing small businesses into failure, depressing property values in small towns, etc.), and to communities (by contributing to the decay of the social fabric of communities).

Unfortunately, the Park's proposed development complex on the LeVan farm is a striking example of exactly the kind of sprawl dovelopment that the Commission has identified as the foremost socio-environmental problem in the Commonwealth, and has strongly recommended against.

dd Question 3.6: How is the proposed development complex in keeping with the recommendations of the 21st Century Environment Commission?

### 3.13 FINDING OF NO SIGNIFICANT IMPACT — REGIONAL VS. LOCAL

ee It is important to note that GNMP has issued a Finding of No Significant Impact in regards to the economic impact of its proposed commercial development *on the regional economy* The GMP concedes that *"some adverse impact on local businesses will result.. but.. no significant impact on the regional economy."* This seemingly subtle bit of wordplay is critically important, because on the local/municipal level what is proposed will transfer economic impact by removing a significant level of tourist visitor spending from an established commercial district in a municipality that has come to depend on the revenues generated there (i.e., Gettysburg Borough) and shifting it to another municipality (Cumberland Township) with no significant tourism and visitor services infrastructure in that particular area. While the argument for creating positive economic impact to Cumberland Township may be attractive, the fact is that it comes not so much from the creation of new business as it does from the pillaging of an existing commercial area in a neighboring municipality, facilitated by a decision of a federal agency.

ff



dd NPS does not consider that this project would contribute to urban sprawl. The facilities replace those already in existence, and relocates them not far from their current location.

NPS has proposed significant measures in the draft GMP/EIS (pages 76, 91-2) to partner with local communities, particularly the Borough of Gettysburg. These initiatives are intended to improve the interpretation of the town of Gettysburg, its citizens and their role and the battle and its aftermath, and to improve visitor services. NPS has entered into a Letter of Intent with the Borough of Gettysburg to accomplish these initiatives. Proposals include:

- Expand the historic pathway and related media and programs [in downtown Gettysburg]
- Cooperate with local entities to preserve, rehabilitate and interpret the Lincoln Train Station [in downtown Gettysburg]
- Establish a partnership with local governments, the Commonwealth of Pennsylvania and private groups to acquire, preserve, interpret and operate the Wills House
- Establish a NPS presence in downtown Gettysburg
- Develop, in coordination with local entities, an active menu of programs, interpretation, living history and tours to educate visitors about Gettysburg's role in the battle, its aftermath and the preservation of the battlefield.
- Provide information in the park's museum complex about the town of Gettysburg, the historic pathway, and other sites, along with information about local and regional visitor services (hotels, restaurant, etc.)
- Work with the community and private entities to provide regular shuttle service between the museum complex and downtown Gettysburg.
- Incorporate the community in the park's auto tour.

These activities, combined with actions described elsewhere to limit additional development on Baltimore Pike, should not encourage additional sprawl.

ee The NPS did not issue a Finding of No Significant Impact (FONSI) in regards to the economic impact of the preferred alternative upon the regional economy. FONSIs are issued only after an environmental assessment has been completed and the agency has determined that the proposal selected has no significant impact on the resources and community. Rather, NPS stated that implementation of this alternative should result in "increases in economic activity" in "nearly all economic sectors." These findings are discussed in the draft GMP/EIS in Chapter 4.

## COMMENTS

By moving the focus of visitor orientation and activity outside of the established commercial district, the walking traffic that is the heart of the district will diminish to such a degree that substantial adverse impacts on the local economy and the community will certainly result. The newly captive visitor audience will be forced to turn to the new facilities to meet their needs. A new commercial district will likely emerge in Cumberland Township, eventually replacing the district in Gettysburg Borough. (It can, and has been argued that the area on the Baltimore Pike is zoned residential, and thus cannot be developed as a commercial zone. This is either naive or a blatant attempt to deflect criticism, as anyone involved with land use in Pennsylvania can attest that zoning districts are often changed to meet changing conditions. In fact, purchase offers are already being made to property owners on the Baltimore Pike by commercial speculators.)

gg Every Park has a core area, a center, if you will. For Gettysburg, the core consists of three parts — The National Cemetery, the Museum, and the Cyclorama Visitor Center. The accompanying graphic map (see Figure 2, page 19) clearly illustrates the impact of the proposed action, moving two of three core elements away from the heart and soul of the Park (The National Cemetery) and the adjacent commercial district of the Borough of Gettysburg. The historic core of the Park will, in effect, be sundered. This approach is contrary to NPS planning guidelines, which state that commercialism should be kept out of the core areas of National Parks. Instead, commercial ventures should be placed in special commercial zones which are adjacent and convenient to the currently existing Park core.



## RESPONSES

ff The draft GMP/EIS acknowledged that the relocation of park visitor facilities might change visitor spending patterns and create indirect effects on area development or individual businesses (pg 246). The impact of the alternatives on pedestrians were considered, and, at the request of the Borough of Gettysburg and others who attended public workshops, actions to mitigate possible effects were incorporated into the plan alternatives. These actions include: NPS partnership in the development of the Wills House; an NPS ranger presence downtown; strengthening the historic pathways pedestrian environment; expansion of NPS' auto tour to include downtown Gettysburg; inclusion of a downtown/NPS visitor center shuttle; continued promotion of local visitor services by the Visitors and Convention Bureau in the park visitor center; and routing of the auto tour along Steinwehr Avenue. NPS and the Borough of Gettysburg have signed a Letter of Intent to begin development of interpretive planning for these activities. NPS believes that these actions will strengthen the historic district, enhance pedestrian use of the area and improve the visitor experience.

The impact of these actions was considered in the economic analysis, which predicts an overall positive impact on the local economy and tourism as a result of the action alternatives proposed in the draft GMP/EIS. That analysis indicates that the proposal would have a positive impact on the local economy.

gg The historic core area of the park is not composed of or dependent upon visitor facilities. The historic core of the park has been identified within the draft document as that combination of unique and nationally significant resources that together make up the historic resource area. This area is composed of the contributing landscapes of the Major Battle Action Area, the Soldiers' National Cemetery, and the Battlefield Commemorative Resources Area—all of which are the essence of Gettysburg National Military Park. The current Visitor and Cyclorama Centers have already sundered the historic core of the park. Relocating the visitor use facilities from their present (and relatively recent) sites adjacent to the national cemetery would not adversely affect the historic core of the park. In fact, their relocation to a site outside of the Major Battle Action and Battlefield Commemorative Resources Areas would enhance this historic park core. The site proposed for the new museum complex is outside of the historic park core and therefore would fulfill NPS mission goals and planning guidelines.

RESPONSES

COMMENTS

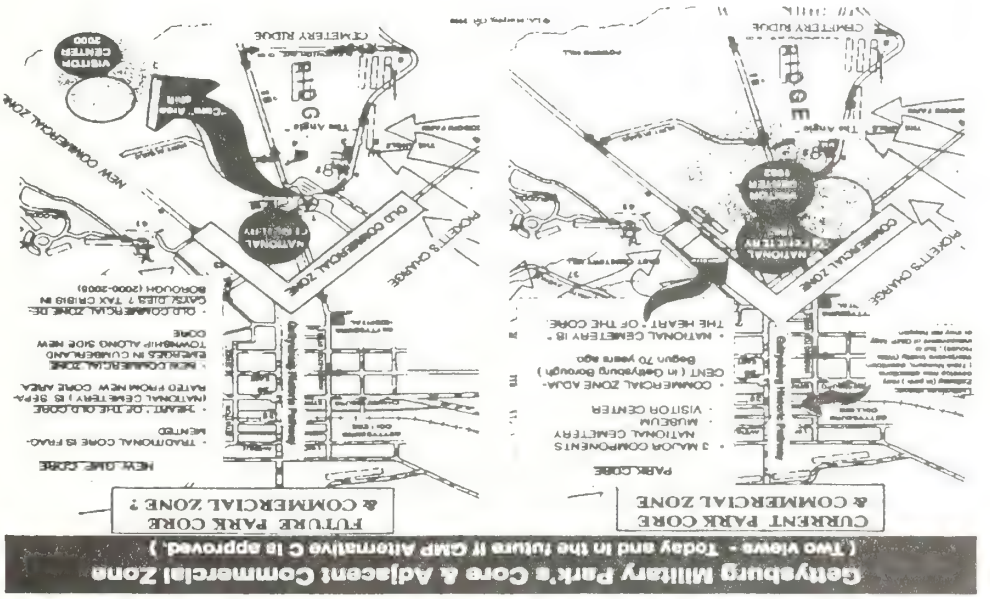


Figure 2

### 3.14 NPS POLICY REGARDING PREFERENCE FOR OUT-OF-PARK COMMERCIAL SERVICES

The creation of a new visitor center museum complex that contains any commercial elements which would compete with existing local enterprises, and that do so in a way that creates an unfair competitive advantage, is not only morally, ethically and historically wrong, but it in fact is contrary to National Park Service Policy.

The National Park Service recognizes the fact that it is inherently wrong for public institutions which are supported by taxpayer dollars to enter into commercial activities that directly, and potentially unfairly, compete with the very taxpayers whose dollars go to support the institutions. The NPS position on this matter is clearly spelled out in some of its own policy documents.

In the policy document known as *National Park Service Management Policies*, under the heading Park Planning in a Regional Context, the NPS says the following:

> *"Many park management and resource protection issues are not confined by park boundaries. Since park boundaries may not incorporate all of the natural resources, cultural sites, and scenic vistas that relate to park resources or the quality of the visitor experience, the activities on adjacent lands may significantly affect the success of park programs. Furthermore, the activities of the National Park Service may have effects outside the boundaries of the parks. Recognizing that parks are integral parts of larger regional environments, the National Park Service will work cooperatively with others to anticipate, avoid, and resolve potential conflicts, to protect park resources, and to address mutual interests in the quality of life for community residents, considering economic development as well as resource and environmental protection. Such regional cooperation will involve federal, state, and local agencies, native American authorities, neighboring landowners, and all other concerned parties.*
>
> *Through planning, parks will be considered within the broader context of the surrounding region. Cooperative regional planning will be undertaken to integrate parks into their regional environments and to address adjacent land use issues that influence park resources. This will occur on an ongoing basis as well as during the development of general management plans and other plans. Information on the status of cooperative regional planning will be included in each park's updated statement for management... Early coordination on specific proposals and projects will occur to ensure that various points of view are considered in formulating proposals and that potential conflicts are identified and avoided or resolved if possible.*
>
> *Superintendents will work with neighboring landowners on topics of mutual interest and will explore ways of providing technical assistance to neighboring landowners. The National Park Service will be sensitive to the influences and impacts that its management of park lands may have on adjacent landowners, and*

*it will seek to enhance beneficial effects and to mitigate adverse effects in whatever ways are consistent with its policies and management objectives."*

hh This kind of comprehensive on-going cooperation has not taken place, and is not reflected in the GMP. Outreach has been selective and manipulative, concentrating on known supporters of the Park's administration and its programs and local entities that stand to gain by an association with the Park. The strategy, rather than being open and inclusive, has served to divide the community.

Furthermore, and very much more directly and to the point, in the section headed Concessions Management, sub-headed Concessions Planning, *NPS Management Policies* goes on to state:

*"Preference for Out-of-Park Private Enterprise*

*If adequate facilities exist or can feasibly be developed by private enterprise to serve park visitors' needs for commercial services outside park boundaries, such facilities will not be expanded or developed within parks."*

ii While it is understood that the semantic argument can me made that what is proposed is not a "concession," by strict definition, but a "partnership" that is operating on private land (thus "outside the Park" even though the land in question is in fact wholly surrounded by the Park and is part of the battlefield), the fact is that in reality the proposed commercial services do meet the test. If it were deemed a concession, this Agency partnership would represent the development of facilities to serve park visitors' need for commercial services within park boundaries where adequate facilities already exist outside. In addition, the proposal for development calls for the facility to eventually be turned over to the Park Service, at which time it would become a concession "inside the Park."

3.15 NPCA TESTIMONY REGARDING CONCESSIONS

Testimony given to Congress on 24 February, 1998 by the National Parks and Conservation Association (NPCA) on the visitor center proposal raises a number of concerns about the commercial aspects of the proposed development and clarifies this issue of whether or not the proposed commercial elements should be considered as "concessions." In this testimony, it is important to note that NPCA says:

jj *"Related commercial activities (such as concessions) are not in and of themselves inappropriate in national parks; however, more at issue here is what standards should be used to judge the appropriateness of the commercial activities proposed for this complex and possibly for other similar future partnerships. NPCA contends that only the strictest standards should be applied. As these commercial activities will ultimately become concessions when the property is donated to the*





hh As summarized in Chapter 5, "Consultation and Coordination," NPS conducted an extensive and open scoping and public involvement program during the planning process between March 1995 and the publication of the draft GMP/EIS in August 1998. Representatives of local governments, as well as local agencies, community groups and individuals were invited to, and participated in, these public involvement opportunities. The comments received during these meetings influenced the alternatives presented in both the 1996 DCP for the visitor center/museum proposal, and the draft GMP/EIS.

ii The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

jj Although there are no concession activities proposed in the museum complex, we concur with NPCA's concerns that visitor services offered in the complex must be necessary and appropriate. (For NPCA's response, see letter #345.)

## COMMENTS

*Park Service after the retirement of the debt, they should meet, at a minimum, the necessary and appropriate tests governing concessions under federal law."*

The "strictest standards" that should be applied are clearly and simply stated in the above referenced section of the NPS Management Policies, which bear repeating — *"If adequate facilities exist or can feasibly be developed by private enterprise to serve park visitors' needs for commercial services outside park boundaries, such facilities will not be expanded or developed within parks."*

### 3.16 NATIONAL PARK SERVICE DIRECTOR'S ORDER #32: COOPERATING ASSOCIATIONS AND CONCESSIONS POLICY ACT

Furthermore, *National Park Service Director's Order #32: Cooperating Associations*, effective date March 17, 1998, section 3.5.3.b. states:

kk *"The sales of visitor convenience items must be conducted under the authority of the Concessions Policy Act and must be managed in the same manner as concession permits/contracts issued to concessionaires."*

Again, this refers to and supports NPS policy against developing commercial facilities within the Park boundaries that duplicate and compete with similar services currently offered by private enterprises outside the Park.

### 3.17 DO COMMUNITIES MATTER?

The National Park Service has given clear direction to all of its units on the matter of cooperating with local communities in all aspects of its operation and planning. The primary planning guidance document for the NPS, *NPS Director's Order 2: Park Planning*, lays out at least two very direct mandates, as follows:

***"3.1.0 General Principles***
*3.1.2 Public Involvement — Public participation in planning and decision making will ensure that the National Park Service fully understands and considers the publics' interest in the parks as part of their national heritage, cultural traditions, and community surroundings. To the maximum extent possible, the National Parks Service will actively seek out and consult with existing and potential visitors, neighbors, people wit traditional cultural ties to park lands, scientists and scholars, concessioners, cooperating associations, other partners, and government agencies.."*

***"3.3.1.0 General Management Planning***
*3.3.1.7 Public involvement will be adequate to learn about the concerns, issues, expectations, and values of existing and potential visitors, park neighbors, people with traditional cultural ties to lands within the park, concessioners, cooperating associations... Through public involvement the National Park Service will share information about the planning process, issues, and proposed management*



## RESPONSES

kk The Director's Order you refer to covers NPS' relationships with its cooperating associations. Eastern National is currently NPS' cooperating association for sales in the current park bookstores, and for the book and museum stores in the proposed new visitor facilities. All sales in the park's book and museum store currently meet the requirements of NPS 32, and NPS would continue to ensure that they do so.

# COMMENTS

*actions; learn about the values placed by other people and groups on the same resources and visitor experiences; and build support among local publics, visitors, Congress, and others for implementing the plan."*

The Park has made repeated statements lauding its efforts in holding public meetings and workshops, and generally making itself and its plans available for public input. However, as of this writing, serious and significant concerns, indications of no support and calls for rejection of the draft GMP have emerged from Gettysburg Borough, Cumberland Township, the Gettysburg Retail Merchants Association, the Gettysburg Convention and Visitors Bureau, the Gettysburg Battlefield Preservation Association, individual citizens and businesses, and a host of others. With such a significant body of opposition and concern to the draft GMP emerging, the value of the Park's outreach efforts must be called into question.

ll Question 3.7: Has the Park really been listening? Has its outreach included only known supporters? Do communities really matter?

**3.18 CALL FOR REJECTION BASED ON ADVERSE ECONOMIC IMPACTS**

Not only are the proposed developments in contradiction to Park Service, but they are demonstrably detrimental to the local economy. For this reason alone, it is recommended that the GMP be rejected and redone to first establish the general guidelines for resource management and development. Once, and only after this is completed and accepted, it is recommended that then a supporting development concept plan and specific implementation plan be pursued. This would properly establish the parameters for the development of new visitor and collections storage facilities in the context of the resource management objectives, and that parameters for the development and siting of these facilities include locating them in a place that supports, rather than undermines, the local supporting commercial district and that does not duplicate and seek to compete with existing private enterprises.

mm Question 3.8: How does the Park justify the expansion and development of commercial services inside the boundaries of the Park when adequate facilities currently exist outside park boundaries, and in light of the National Park Service's own policies regarding a preference for out-of-park Private Enterprise?



# RESPONSES

ll As outlined in Chapter 5, "Consultation and Coordination," of the draft GMP/EIS, NPS has provided numerous opportunities for public comment as draft plans were formulated. In 1995, NPS began considering alternatives for development of collections storage, visitor center and museum facilities. The DCP process included an Environmental Assessment with a formal scoping meeting, a formal 30-day review period for the scoping documents, 2 sets of subsequent public workshops, the release of a draft DCP/EA evaluating 4 alternatives and a 45-day public review period.

During the development of the draft GMP/EIS, four newsletters and an informational mailing on the Visitor Center project were sent to the 3,800 people on the GMP mailing list. In response, NPS received more than 3,300 comments, including 960 individual letters and more than 2,800 responses to questionnaires or newsletters. The public responses substantially influenced both the draft GMP/EIS alternatives as presented, and NPS negotiations on the museum proposal.

As a part of the GMP process, NPS conducted 30 public workshops, open houses, or hearings, including 6 presentation/ question and answer workshops during the formal 60-day public comment period on the draft GMP/EIS. Over 500 public comments were received during the formal public review period.

mm The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

# COMMENTS

## SECTION 4 — ECONOMIC IMPACT EVALUATION CONCERNS

### 4.1 ISSUES OF SCOPE AND PROCEDURE

The underlying economic impact study that was developed to support the decisions presented in the GMP have a host of specific problems, omissions, contradictions and understatements. Before going further, it should be stated that this fundamental background document (*Economic Impact Evaluation: Gettysburg National Military Park General Management Plan Alternatives*, prepared by The Office of Thomas J. Martin Economic Research and Management Consultants, August 1998) was not included in the Draft GMP that was released to the public, but was only released to comply with a Freedom of Information Act (FOIA) request. Furthermore, the economic impact evaluation was presented as an economic impact evaluation of GNMP's General Management Plan Alternatives. However, the alternatives that it studies are in fact only two, and neither is directly related to resource management of this NPS unit. The alternatives studied and evaluated are only the "no action" alternative and the proposed visitor center, museum and commercial services development.

h (cont.)

### 4.2 ABSENCE OF PRIMARY RESEARCH

Particularly troubling is the fact that no primary research was pursued in the course of completing the economic impact evaluation. Instead, the consultants relied solely on information provided by the administration of GNMP and its pre-selected development partners and other prime advocates and beneficiaries of the proposed development alternative. For example, one of these secondary sources was a study completed by an individual who has gone on to become an employee of the Friends of the National Parks at Gettysburg, Inc., an organization that has been steadfast in its support of the GMP and which enjoys a monopoly on fund raising in the Park.

This lack of primary research, especially as it relates to any adverse impacts on the local economy, obviously undermines the findings and recommendations of the GMP, as the level of objectivity necessary for a realistic evaluation can come only through a reliance on primary research that is supplemented with existing material and information. In fact, when the Park's consultants were asked at a public workshop about the source of the numbers used in making projections regarding the bus concessions, the reply was that the "numbers were just 'plugged in.'"

nn

Question 4.1: Why was no primary research conducted for the Economic Impact Evaluation? Why was the expertise, experience and input of the full range of business and municipal interests not sought and included in the evaluation process?



# RESPONSES

nn Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP/EIS and the 15 meetings on the draft DCP, as were representatives of local municipalities. Appendix 10 indicates local business and municipal attendance at these public meetings. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5 lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period on September 9, 1998 to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

# COMMENTS

### 4.3 DISCREPANCIES AND INCONSISTENCIES

During the scheduled public workshops to discuss the Draft GMP, several discrepancies emerged regarding the basis figures used by the consultants who completed the economic impact evaluation and the stated operating assumptions used by the administration of GNMP and its partners. For example:

| | |
|---|---|
| oo | • Hours of operation of the theater were variously stated as being open until 2:00 p.m., being open until 5:00 p.m., being open until the Park closed, and being open for evening showings. In addition, the food service facility (a 300-seat cafeteria) was first proposed to be open only during the mid-day hours, but then stated as being open as long as the theater is open. |
| pp | • In both the GMP and the Economic Impact Evaluation there are discrepancies in the methodology for estimating customer capture and per capita spending for food service and related purchases and expenditures. |
| qq | • Projected sales for the Eastern National Bookstore unit in the proposed complex are well below the current sales figures when calculated on a square footage basis. |
| rr | • The Economic Impact Evaluation and the GMP itself indicate an intention to institute a shuttle bus service to ensure that visitors will continue to have ready access to the Gettysburg commercial districts. However, no figures for such a service are included in the cost projections in the GMP. |
| ss | • The Economic Impact Evaluation fails to properly consider the fact that the GMP proposes to restrict private vehicles from certain roads within the Park. The increased applications of such restrictions to private vehicles would provide an increase in financial incentives for tour bus operators who would have exclusive access to restricted roads, at the expense of existing private businesses in the area. |

Question 4.2: Why do these and other inconsistencies and discrepancies emerge, and why were detailed data checks and revenue projections not included in the evaluation?

### 4.4 FLAWED EVALUATION = FLAWED CONCLUSIONS

A flawed economic impact evaluation, based only on secondary sources, that considers only one, pre-determined visitor center, museum and commercial service complex and that was only released through a FOIA request is not a sound and objective gauge of the impact of the proposed development on the community. Even so, it projects *at best* a modest positive impact to the local community, with the potential for negative impacts, even though visitor counts are projected to rise. Again, it appears that this is in direct contradiction to NPS policies regarding a preference for out-of-park private enterprise.



# RESPONSES

**oo** At this time, the theater would be open during the regular operating hours of the facility. Food service would be available only when the museum is open. In addition, the facility might be used for special programs, meetings and other events in the evening hours, as the park's existing centers are now.

**pp** NPS uses per capita, not per square foot, figures to calculate actual sales in its visitor center book and museum stores. This is standard industry practice, and is recommended for use in museums by the Museum Store Association. NPS considers that per capita figures provide accurate information for estimating impacts.

**qq** NPS uses per capita information to determine and report on sales in its visitor centers. In addition, the Museum Store Association recommends the use of per capita figures when developing projections and reporting on actual sales in museums and visitor centers. For these reasons, per capita sales, which are independent of square footage, were used to project potential sales in the book and museum store for the various draft GMP/EIS alternatives.

**rr** Costs for the shuttle were inadvertently left out of the cost estimate. This omission will be corrected in the final GMP/EIS.

**ss** None of the prescriptions proposed in the draft GMP/EIS action alternatives would provide exclusive use of avenues to tour bus operators. Page 95 of the draft GMP/EIS notes that seasonal restrictions of internal park avenues at some times of the year would allow pedestrian use of these avenues. Also recommended were limiting bus use of narrow avenues with tight curves. The economic impact analysis did consider these minor seasonal and visitor use restrictions that were included in the draft GMP/EIS.

# COMMENTS

### 4.5 NATURE OF THE PROPOSED PUBLIC/PRIVATE PARTNERSHIP

The proposed public/private partnership program being forwarded for implementation by the Agency at this unit demonstrates programmatic activity. Pursuant to NEPA, a programmatic Environmental Impact Statement would be required, and has not been pursued. This issue of programmatic activity has not been pursued, and should be addressed.

tt Question 4.3. Why is a programmatic EIS not being pursued for this proposed public/private partnership program? Under what legislative authority is the NPS implementing this precedent setting program?

uu

As an additional economic consideration, the nature of the proposed public/private partnership does not appear to be consistent with the stated benefits. Two items of particular interest emerge here.

First, the administration of GNMP has stated that the proposed visitor center, museum, commercial services, collections storage and administration facilities would be provided by the developer *at no cost to GNMP*. To support this position, no line item costs have been identified, and the Draft GMP states (on P. 98) that

> *"NPS would pay no rent on its museum, administrative space, curatorial storage, library and classrooms."*

However, some costs would in fact be incurred: on the same page, next paragraph, the document goes on to say that

> *"Tenants, Including NPS, would reimburse the Foundation for its costs to provide these services."*

vv

These costs are not specified.

Secondly, the nature of the new Foundation which is the core of the proposed public/private partnership has been presented as a purely philanthropic gesture on the part of a private real estate developer and commercial/industrial construction contractor. When asked at a public workshop what his motivations were, the developer's spokesperson delivered a moving speech about these purely philanthropic motives. However, the President's Column in the Fall 1998 edition of the newsletter of the Friends of the National Parks at Gettysburg relates the following:

ww

> *"We were also able to meet and talk with Mr. Robert Kinsley...as you doubtless know, Mr. Kinsley's company will be doing the construction work on the new museum."*



# RESPONSES

tt NPS is considering a variety of partnership options for meeting the needs of individual parks throughout the system. Each potential partnership differs in terms of the type of partners, agreements, location, fund-raising strategies and other important considerations. Because each park has its own, specific requirements, and each partnership is unique, NPS does not believe that there is a need for a programmatic or service-wide environmental impact statement for museum partnerships.

uu Legislative authorities include 16 USC 1 et seq and 16 USC 6 et seq. 16 USC 6 et seq. explicitly authorizes the Secretary of the Interior to accept buildings and other property which may be donated for the purposes of the National Park System.

vv The costs of operating and maintaining the building on a day-to-day basis include utilities, janitorial service, insurance, routine building repairs and maintenance, and structural reserve. In order to recoup these annual costs, the pro forma suggests that all occupants of the facility pay a prorated share of the total building operating costs, based upon the square feet of space occupied. Details may be seen in the "Economic Impact Evaluation" report from The Office of Thomas J. Martin.

ww To the question regarding any potential sources of gain to the Kinsley Construction, Inc., Robert Kinsley or the Kinsley family, Mr. Kinsley has provided this response. "The Kinsley proposal was to create a non-profit 501 (c) (3) foundation, the Gettysburg National Battlefield Museum Foundation, which would be the "developer" of the project. This would enable contributions to be made to the Foundation that would be tax-deductible by the donor. The Foundation will have a national board of directors comprised of representatives from the business, financial, educational and historical communities. I hope to serve on the board of directors. The board of directors will be formed after the General Management Planning process is completed and the definitive agreement between the Park Service and the foundation is finalized. The operation of the visitor center and museum will not result in any economic benefit to me, as all net proceeds realized by the Foundation from operations will inure to the benefit of the NPS. I will also have no financial interest in any of the entities operating within the visitor center, such as the tour companies, the film theater, the food service or any book or museum store.

# COMMENTS

It is obvious from this disclosure that this Cooperator will in fact realize substantial financial gain from the proposed development, in the form of construction contracts on a $40,000,000 building complex. If this is in fact true, it would appear to contradict the supposition that construction contracts should follow federal bidding and construction guidelines, given the fact that the complex will eventually be turned over to the NPS.

Question 4.4: What is the true nature of the financial arrangements between the private operating partner (the Gettysburg Battlefield Museum Foundation and the Kinsley enterprises) and the Park? What hidden financial incentives and motivations are at work in the proposed plans for commercial services? Will federal bidding procedures and construction guidelines be followed in the construction of the complex?

### 4.6 FAILURE TO EVALUATE SPECIFIC ECONOMIC IMPACTS ON THE BOROUGH OF GETTYSBURG

The failure of the Economic Impact Evaluation to pursue a specific economic analysis of the impacts on the Borough of Gettysburg as a municipality calls the substance and the depth of the Evaluation into serious question. Gettysburg is already suffering under considerable tax stress, with less than 50% of its properties on the tax rolls. Any further deterioration of this tax base will place unacceptable burdens on its residents and the municipal government which serves them. These impacts should have been considered in detail for the Borough.

XX Question 4.5: Why was a Borough-specific economic analysis completed in order to ascertain the true impact of the proposed development on the municipality?



# RESPONSES

"I am Chairman and Chief Executive Officer of Kinsley construction, Inc., a regional construction contracting company that I started over thirty-five years ago. Kinsley Construction has averaged annual construction volume of $150 million over the past several years. We hope that the Foundation's board of directors will select Kinsley Construction to manage the construction of the visitor center project, however that decision ultimately will be made by the board of directors after it is formed. As construction manager, Kinsley construction would manage competitive bidding of all contracts for construction. The construction cost of the project is approximately $22 million. If the board of directors decides that it is in the best interest of the foundation and its purposes to select Kinsley Construction to be the construction manager for the project, we envision that Kinsley Construction would be paid a construction management fee competitively priced with fees typically charged on similar construction management projects.

"To date, Kinsley Equities, a Kinsley family partnership, has provided all of the seed money for this project, without any guarantee that any of it will be returned. By January 1999, prior to signing an agreement with NPS, Kinsley Equities will have advanced to the Foundation approximately $3.5 million dollars at no interest to acquire the Levan site and the RV site and to fund all the studies that have been required, including wetlands, endangered species, archeological and traffic studies. That amount also includes site planning performed to date by LSC Design, Inc., an architectural and engineering company primarily owned by the Kinsley family. All other start-up expenses, including costs involved in the public relations efforts and the cost of Kinsley Construction personnel devoted to the planning of the project prior to the agreement with the NPS, have been borne by Kinsley Construction and will not be reimbursed.

"After the fundraising is completed, including the establishment of a mechanism to ensure the creation of an endowment for ongoing funding needs, the construction of the museum and visitor center project is complete, and operations commence successfully, it is likely that I will have considered my mission accomplished and would step aside for others to continue this good work. I have no financial interest other than what has been explained in this letter."

NPS has not yet made a decision regarding the use of federal bidding procedures during the construction.

This information was released to the public during the GMP planning process.

# COMMENTS

## SECTION 5 — HISTORIC ISSUES RELATED TO THE PROPOSED VISITOR AND COMMERCIAL SERVICES COMPLEX

The proposed site for a new visitor center, collections storage, museum and commercial services complex is a private land-holding wholly surrounded by the Park (the LeVan Farm). This is a previously undisturbed area of the battlefield.

### 5.1 THE PEER REVIEW PANEL OF HISTORIANS

In the process of examining this site to determine its suitability for development, a peer review panel of seven (non-NPS) historians was convened by the GNMP Advisory Commission in January and February of 1998. The report that was generated and published in March of 1998 indicates generally favorable reviews for the Park's plans. However, the actual verbatim reports from the historians contain comments that do call the visitor center proposal into question — comments that were censored out of the final report. The most telling example is found in the comments of Mark A. Snell, Director of the George Tyler Moore Center for the Study of the Civil War at Shepherd College.

On the question that asks for advice on whether or not there was any evidence of battle action...that may have been missed in the evaluation of the LeVan and Fantasyland tracts, Mr. Snell made the following comments:

*"This question should have been posed to non-NPS historians **before** a successful bidder was named, not after, lest the Peer Review Panel's comments be interpreted merely as a 'rubber stamp' to the NPS decision."*

*"There has been far too little scholarship on the role of logistical operations at Gettysburg. The LeVan and Fantasyland sites are located in what would be prime areas for ordnance and subsistence distribution...Until more study has been done...it might be wise to locate the new visitors complex in an area where we are **absolutely certain** that nothing happened."*

yy

*"If the NPS decision is to go ahead with the current proposal, I think it would be more acceptable to locate the complex on land that had already been compromised..., such as the Fantasyland site. I wholeheartedly support the NPS's efforts to remove the current Visitor's Center from Cemetery Ridge; I just am not happy with the fact that such a large complex is going to be constructed on pristine land that, to the best of my knowledge, has never been disturbed."*

Question 5.1: Why were arguments against building on the LeVan site censored out of the final peer review panel of historians report?



# RESPONSES

xx NPS defined the area affected by the proposed alternatives as the communities within which the park is located and those that are adjacent to it. Visitor facilities within the park are located in five townships, and commercial services for tourists are located in these townships, adjacent townships and the Borough of Gettysburg. For this reason, the economic assessment incorporated all of the communities that might be affected by the alternatives incorporated in the draft GMP/EIS.

NPS discussed the affected area it felt was appropriate during public scoping and resource workshops. During the various public workshops, NPS was asked to consider the impacts of the proposal on specific segments of the tourism economy, and this was done. However, NPS was not asked to perform separate economic assessments during these scoping meetings.

The draft GMP/EIS notes that although some individual businesses may be affected by the proposal, the overall economic impacts from the action alternatives on the economy of the affected area are positive. Therefore, NPS does not believe that a separate analysis of the economic impact from the proposal on the Borough of Gettysburg would provide additional useful information.

yy The Peer Review panel of Historians convened by the Gettysburg NMP Advisory Commission was not asked for their opinions regarding development of the LeVan tract. The peer review panel were asked to evaluate the methodology, sources and process used to understand the extent of landscape change and the significance of features to the outcome of the battle; to suggest improvements to the methodology, sources and process; advise if the process is a sufficient basis for GMP level decision-making; and to advise if there is evidence of battle action or battle activity that NPS missed in its evaluation of the LeVan tract.

The Peer Review Panel endorsed the validity of the methodological design, agreed with the use of source material and the applicability of NPS' methods of analysis to identify crucial terrain features affecting the outcome of the battle. The panel concluded that the information developed as a result of the analysis provided a sufficient basis for GMP level decisions. The panel agreed with the park historians' assessment of battle related activity experienced on the LeVan tract. The panel also unanimously agreed that the site of Kinzie's and Rugg's batteries, which are marked by monuments and lie at the eastern edge of the 45-acre tract, should be protected. Protection of these sites is considered mandatory by NPS, and the Gettysburg National Battlefield Museum Foundation has agreed to protect the site of these batteries from development.

# COMMENTS

### 5.2 THE CYCLORAMA VISITOR CENTER

In the GMP and throughout the course of its public meetings, the Park has taken great efforts to minimize the value and importance of the Cyclorama Center, criticize the previous NPS decisions that led to its placement, decry its physical condition and suitability, and call for its razing and removal. Initially, the Park was supported in this position by the State's Historic Preservation Officer. However, more recently, the architectural significance of this building has been recognized, and new decisions are emerging that may in fact call for the building's preservation as a nationally-significant piece of architecture.

### 5.3 FAILURE TO PROPERLY PURSUE CONSERVATION OF THE CYCLORAMA CENTER

zz In addition, no funds have been requested or accepted from Congress for any significant improvements or repairs to this building. Much has been made of the fact that climate controls are inadequate, and damage to portions of the painting are appearing. However, no independent assessments have been made to substantiate these claims or to suggest comprehensive mitigation efforts since repair estimates were made in 1993, and even these estimates were not included in the background material supporting the GMP. Casual observation of the building shows blatant neglect for simple building management initiatives — in some cases, carpet covers up HVAC ducts, preventing air circulation and proper function of climate control systems.

aaa Question 5.2 How will the Park respond to the possibility of the Cyclorama Center being declared an architecturally important building and a decision that, as such, it merits protection and preservation? Why have no funds been requested or requested from Congress for any significant improvements or repairs to this building?

zz (cont.)

### 5.4 FAILURE TO PROPERLY PURSUE COLLECTIONS CONSERVATION

The same pattern of willful neglect coupled with a claim that collections are deteriorating due to lack of proper facilities has been applied to the historical artifact and archival collections. These large and historically significant collections, in large part donated to the United States by private individuals to hold in trust for the people of this country, have been allowed to fall into a state of deterioration with little effort to either appeal to Congress for the funding needed for proper maintenance and facilities or take simple mitigation efforts to make a best-faith effort to maintain the collections in good stead. At the same time, the Park has been using items from these collections to illustrate through their sad condition the need for new facilities. This situation has resulted in action from the family of the primary donor of artifacts to request their return based on the Park's gross mismanagement in preserving, conserving and protecting this gift.

bbb Question 5.3: Why have no funds been requested in recent years to address the need for improved collections storage and maintenance?



# RESPONSES

zz Gettysburg National Military Park requested line-item construction funds in 1985, 1990 and 1993 to correct some of the life safety, accessibility and building deficiency concerns of the current visitor center and Cyclorama buildings. In 1996, the park requested line-item construction funds for the complete rehabilitation of both structures. However, neither request successfully competed against the estimated $5.6 billion maintenance backlog of the NPS on a national basis, and consequently neither request was included in NPS' service-wide construction priority list. Therefore, the President has not formally requested any funds from Congress for rehabilitation of these park buildings, as part of the Administration's budget request.

aaa In December 1995, NPS prepared a determination of eligibility for the Cyclorama Center designed by architect Richard Neutra. The NPS determination found that the building did not meet the criteria of exceptional significance necessary to be eligible for the National Register of Historic Places. This finding was concurred in by the Pennsylvania State Historic Preservation Officer in May 1996. Using this finding as a starting point, NPS developed the draft GMP/EIS proposal, which suggests, among other things, the relocation of the cyclorama painting to a gallery where NPS can better preserve it, the removal of the Cyclorama Center, and the rehabilitation of the park's cultural landscapes. In September 1998, after the issuance of the draft GMP/EIS, the Keeper of the National Register of Historic Places reversed this finding, and the building was declared eligible for listing on the National Register. In December 1998, NPS began consultations with the Advisory Council, the Pennsylvania State Historic Preservation Officer, and interested parties and individuals. The NPS prepared a Section 106 Case Report in accordance with the Advisory Council on Historic Preservation regulations (36 CFR Part 800.8). The Case Report and supporting materials were provided to the Advisory Council, the State Historic Preservation Officer, and all interested parties for a 30-day comment period. After considering the comments received from the interested parties, NPS revised Case Report and resubmitted it to the Advisory Council, the State Historic Preservation Officer, and the interested parties, for a second 30-day review period. Comments received from the interested parties, and NPS responses to those comments, were discussed during the April 20, 1999, public consultation meeting. Comments received during that meeting will be incorporated into a final Case Report. On May 14, 1998, the Advisory Council announced its support of the draft GMP/EIS proposed treatment for the park's cultural landscapes, the cyclorama painting, and the Cyclorama Building. Before undertaking these actions, NPS would consult with the Advisory Council and the Pennsylvania State Historic Preservation Officer to develop appropriate mitigation policies with regard to the removal of the Cyclorama Center.

## SECTION 6 — RESOURCE MANAGEMENT ISSUES

While the resource management sections of the GMP are generally comprehensive and well thought and presented, two major issues of concern exist that are directly related to resource management initiatives: GNMP's Deer Management Program, and the woodland and woodlot management plan.

### 6.1 THE DEER MANAGEMENT PROGRAM

On page 26 of the GMP it states that:

> *"Because the park has an approved and implemented plan for management of white-tailed deer, it is not necessary to discuss this issue as a part of the general management plan."*

It is more than a little curious that such a far-reaching and aggressive wildlife management initiative would garner just three sentences out of 329 pages. This program has been the subject of great controversy already, and is in fact currently in litigation (*Davis et al v. Latschar*). Once again, the Park is presenting in the GMP a recent and controversial initiative as complete and incontestable, rather than allowing the GMP to proceed properly and to establish the appropriate comprehensive guidelines that can then be used as a foundation for developing specific wildlife management programs.

The problems with this issue and this approach were further demonstrated at the Park's public workshops on the GMP. In a session dedicated to resource management issues, the Park's Chief of Resource Management began the session by saying that deer would not be discussed, and in fact, due to the on-going litigation, could not be discussed. It would seem that this alone would be cause for at least delaying outright the presentation, discussion and comment on the GMP. Wildlife management, specifically deer management, is a major initiative with considerable impacts to the Park's operation, its landscapes and other resources, its neighbors in the community, and adjacent farms and orchards. The public workshops were designed to clarify and inform. By saying that deer management could not be discussed, and by failing to discuss it in the GMP in any way other than saying that it is going to happen and it doesn't need to be discussed, the Park is acting with negligence, arrogance and malice on this issue.[2]

ccc Question 6.1: Why is the deer management issue not open and available for discussion as part of the GMP, given the fact that it represents a major resource management element, with a range of alternatives and impacts, and given the fact that it does not represent a completed and accepted initiative until pending litigation is resolved?

[2] The deer issue is discussed in complete detail in the Plaintiff's Motion for Summary Judgement, included in the appendices.



**bbb** Gettysburg National Military Park requested line-item construction funds in 1985, 1990 and 1993 to correct some of the life safety, accessibility and building deficiency concerns of the current visitor center and Cyclorama buildings. In 1996, the park requested line-item construction funds for the complete rehabilitation of both structures. However, neither request successfully competed against the estimated $5.6 billion maintenance backlog of the NPS on a national basis, and consequently neither request was included in NPS' service-wide construction priority list. Therefore, the President has not formally requested any funds from Congress for rehabilitation of these park buildings, as part of the Administration's budget request.

Between 1993 and 1999, the park has spent over $703,500 in NPS operating funds to improve storage conditions and preserve archival and curatorial collections. Work accomplished has included backlog cataloging for archival and artifact collections, completion of a Collection Management Plan and a Collection Storage Plan, rehousing of artifacts and archival materials (i.e., in acid-free storage containers), purchase of additional museum storage cabinets and shelving, expansion of the artifact storage area, upgrade of the museum storage intrusion alarm system, installation of a fire suppression system in both the storage area and exhibit area, and improvements to heating and air conditioning systems in the museum exhibit area.

**ccc** The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the draft GMP/EIS are the same as those approved in 1995. The objective is to maintain the density of white-tailed deer at Gettysburg National Military Park and Eisenhower National Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in both the Final White-tailed Deer Management Plan / Environmental Impact Statement (FWDMP/EIS) and draft GMP/EIS would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to

**6.2 MANAGEMENT OF WOODLOTS AND WOODLANDS**

The GMP's proposed management of woodlots and woodlands represents an aggressive program to restore the landscape to its 1863 appearance. The result would be the cutting of some 1,100 acres of woodlands in the preferred alternative. The objective of landscape restoration is laudable, but seems to represent an extreme position that does not fully take into account the passive recreational aspects of the Park and the local effect on wildlife, woodlands, soil and water.

While the Park staff has stated in public workshops that responsible approaches to logging would be pursued, the GMP is not so specific. At the least, the GMP should clearly state that clear-cutting would not be pursued, in favor of a low-impact, environmentally responsible that would favor selective removal over an extended period, thus minimizing and serving to mitigate adverse impacts. This would be in keeping with the Park Service's sustainable design and development mandates.

Throughout its discussion of landscape transformation, the Park once again uses a regional approach to the justification of a finding of no significant impact. While the impact may be seen as minimal on a regional or statewide basis, the local impact on the nature of the environment will be substantially adverse.

Bias in favor of the most historically accurate restoration of the landscape fails to take into account the passive recreational value of the environment and is in some cases hampered by and at cross purposes to the memorial and commemorative aspects of the GNMP experience, for visitors and local residents alike. This issue should be revisited to more properly examine and delineate this value of the Park.

In its proposal to remove woodlot resources through timbering, the GMP's financial projections fail to consider or evaluate the potential revenue that could accrue to the Park for the harvesting of these timber resources. These could be used to offset the costs of woodlot restoration, which are projected to cost the taxpayers $4,750,2700.

ddd Question 6.2: Why are low-impact logging approaches not specified in the GMP? Should the passive experiential aspects and value of the environment as it exists today be more properly considered and delineated in the GMP? Why were no revenues from the sale of timber rights projected in the GMP?



comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a lawsuit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white tailed deer management program was reinstituted at the park 14 days later. The plaintiffs have appealed this ruling and the matter is currently pending.

ddd The draft GMP/EIS states that best management practices would be used during the removal of any trees. These practices include low impact logging.

The purpose of Gettysburg National Military Park, in part, is to preserve and protect the resources associated with the Battle of Gettysburg. NPS Management Policies 4:2 state that "the primary resource management objectives in cultural zones are to preserve and foster appreciation of the cultural resources. The management of their natural resources will support the cultural objectives." Therefore, it is of greater importance, in a park such as the Gettysburg battlefield, to preserve and restore the historic landscapes than it is to maintain the "passive experiential aspects" of the current environment.

No revenues for the sale of timber were anticipated in the draft GMP/EIS; however, as implementation plans are developed, the costs of tree removal could be reduced through the use of partnerships, cooperative agreements, or the use of volunteers.

# COMMENTS

# RESPONSES

## SECTION 7 — CONCLUSION & RECOMMENDATION FOR REJECTION

The preceding review, commentary and accompanying questions taken together constitute a substantial body of concerns, contradictions and problem issues. As detailed above, specific and substantive problems have been identified in areas of policy and procedure, as well as within programs and initiatives recommended in the draft GMP. Core arguments for rejection of the draft GMP revolve around the following:

- The process used to develop the GMP and related facilities plans is in direct contradiction to *National Park Service Director's Order 2*, which calls for general management planning as the first phase of tiered planning and decision making, and for complete, comprehensive public participation in planning.
- By allowing the previously-made decision on the proposed complex to drive the GMP process, and by failing to address the full range of alternatives for the complex, the Park is in direct violation of NEPA.
- The inclusion of the commercial service enterprises in the complex is in direct contradiction to *National Park Service Management Policies*, which specifically delineate a preference for out-of-park private enterprise.
- Inclusion of the proposed commercial services complex is contrary to the *1990 Gettysburg National Military Park Boundary Legislation.*
- The proposed development is in conflict with the findings of the Governor's 21st Century Environment Commission for the Commonwealth of Pennsylvania.
- The Economic Impact Evaluation was completed without any primary research, and contains numerous discrepancies and inconsistencies.
- The Economic Impact Evaluation did not include a specific comprehensive economic analysis of the Borough of Gettysburg.

Despite numerous objective attempts to reach compromise conclusions, it is the view of this report that only one realistic recommendation can be made at this point — this GMP should be rejected, and immediate efforts taken to initiate a new approach that seeks to restore the trust and confidence in the Park that has been sadly diminished.

This conclusion was reached after realizing that the GMP, if implemented, would result in an unacceptably substantial adverse impact on the community of Gettysburg, it residents, small businesses and critical tax base. Consequently, concerned citizens are compelled to appeal for a complete rejection of the General Management Plan and the immediate initiation of a new, community-based approach to planning that preserves and builds upon the mutually beneficial relationships that have evolved over the past 135 years.

## LIST OF APPENDICES

- Letters of opposition/no support to the draft General Management Plan from Gettysburg Borough Council; Cumberland Township; Gettysburg Area Retail Merchants Association; and the Gettysburg Convention and Visitors Bureau.
- Letter from Angela Rosensteel Eckert requesting return of artifacts.
- Plaintiffs' Motion for Summary Judgment in the case of Davis, et. al. v. Latschar.
- List of Businesses within two-fifths of a mile of current Visitor Center.
- Original Letters for Peer Review Panel of Historians.
- Rulings on Historical Significance of Cyclorama Center.
- Gettysburg Visitors Guide (noting businesses that advertise "...located within walking distance of the Visitor Center, Cyclorama, and all major park attractions...").
- Gettysburg Battlefield Preservation Association Report on the draft General Management Plan (to be delivered under separate cover).

# COMMENTS

# RESPONSES

Restaurants/Food & Snack Shops (within 2/5 mile of Visitors Center)

| | | |
|---|---|---|
| General Picketts Buffet | 571 Steinwehr Ave | Restaurant |
| Kentucky Fried Chicken | 539 Steinwehr Ave | Restaurant |
| Hardees | 533 Steinwehr Ave | Restaurant |
| McDonalds | 517 Steinwehr Ave | Restaurant |
| Friendlys | 445 Steinwehr Ave | Restaurant |
| Shoneys | 259 Steinwehr Ave | Restaurant |
| Exxon | 243 Steinwehr Ave | Convenience Store (Food/Snacks) |
| New Restaurant (Costa's Pastas) | 226 Steinwehr Ave | Restaurant |
| Gingerbread Man | 217 Steinwehr Ave | Restaurant |
| Tommys Pizza | 105 Steinwehr Ave | Restaurant |
| Dobbin House | 89 Steinwehr Ave | Restaurant |
| Springhouse Tavern | 89 Steinwehr Ave | Restaurant |
| Big Boppers | 985 Baltimore Pike | Restaurant |
| Sutler's Store | 999 Baltimore Pike | Food/Snack Shop |
| Snack-A-Doodle-Do | 777 Baltimore St | Food/Snack Shop |
| General Meades Place | 777 Baltimore St | Food/Snack Shop |
| Buckley's, An Irish Pub | 44 Steinwehr Ave | Restaurant |
| Kilwins | 37 Steinwehr Ave | Food/Snack Shop |
| Sunset | 33 Steinwehr Ave | Food/Snack Shop |
| Avenue Restaurant | 21 Steinwehr Ave | Restaurant |
| Camelot | 3 Steinwehr Ave | Restaurant |
| Brigades | 516 Baltimore St | Restaurant |
| Sheetz | 517 Baltimore St | Food/Snack Shop |
| Ritas Italian Ice Shop | 523 Baltimore St | Food/Snack Shop |
| KrackerJacks | 619 Baltimore St | Restaurant |
| The Fudge Kitchen | | Food/Snack Shop |
| Farnsworth House | 401 Baltimore St | Restaurant |

Gift Shops (within 2/5 of Visitors Center)

| | | |
|---|---|---|
| The Battle Theater | 571 Steinwehr Ave | Gift Shop |
| Grannies Attic | 922 Johns Ave | Gift Shop |
| Lincoln Train Museum | 425 Steinwehr Ave | Gift Shop |
| Gettysburg Gift Center | 297 Steinwehr Ave | Gift Shop |
| Shoney's | 259 Steinwehr Ave | Gifts & Souvenirs |
| Das Gift Haus | 244 Steinwehr Ave | Gift Shop |
| The Turning Point | 240 Steinwehr Ave | Gift Shop |
| PB Floyd & Company | 240 Steinwehr Ave | Gift Shop |
| Centennial General Store | | Gift Shop |
| Battlefield Tours | Intersection of Taneytown Road and Steinwehr Avenue | Gift Shop |
| Gettysburg Miniature Soldier | 200 Steinwehr Ave | Gift Shop |
| McClosky's Mercantile | 241 Steinwehr Ave | Gift Shop |
| Servants Olde Tyme Photos | 230 Steinwehr Ave | Gift Shop |
| Conflict | 213 Steinwehr Ave | Gift Shop |
| The Crossroads Emporium | | Gift Shop |
| Country Curiosity Shop | 89 Steinwehr Ave | Gift Shop |
| Gettysburg Tour Center | 82 Steinwehr Ave | Souvenir Shop |
| SG Marinos | | Gift Shop |
| Battlefield Military Museum | 900 Baltimore Pike | Gift Shop |
| English Rose Cottage | 1009 Baltimore Pike | Gift Shop |
| Sutler's Store | 999 Baltimore Pike | Souvenir Shop |
| Lady's Things | | Gift Shop |
| The Great T-Shirt Company | 65 Steinwehr Ave | Gift Shop |
| An Early Elegance | 61 Steinwehr Ave | Gift Shop |
| Mine Run Gems | 53 Steinwehr Ave | Gift Shop |
| Magic Town | 49 Steinwehr Ave | Gift Shop |
| Cozy Corner Gift Shop | | Gift Shop |
| Past Treasures | 25 Steinwehr Ave | Gift Shop |
| Grannies II | 13 Steinwehr Ave | Gift Shop |
| Wilderness Lodge Leather & Hat Shop | 11 Steinwehr Ave | Gift Shop |

# COMMENTS

# RESPONSES

**Gift Shops (Con't)**

| | | |
|---|---|---|
| Stonehams Gift Shop | | Gift Shop |
| Tessa Bardo Habitat Gift Shop | 1 Steinwehr Ave | Gift Shop |
| Greystones History Emporium & Gallery | 461 Baltimore St | Gift Shop |
| Irish Brigade Gift Shop | 504 Baltimore St | Gift Shop |
| Caldwells Originals | 777 Baltimore St | Gift Shop |
| The Horse Soldier | 777 Baltimore St | Gift Shop |
| JS Smith & Co. | 777 Baltimore St | Gift Shop |
| Old General Store | 777 Baltimore St | Gift Shop |
| The Village Carrousel Shop | 777 Baltimore St | Gift Shop |
| Frankly My Dear | 777 Baltimore St | Gift Shop |
| Smith & Kringle | 777 Baltimore St | Gift Shop |
| Time Line Photos | 777 Baltimore St | Gift Shop |
| Gettysburg Herb Company | 777 Baltimore St | Gift Shop |
| Lolas of Gettysburg | 777 Baltimore St | Gift Shop |
| The Inkwell | 777 Baltimore St | Gift Shop |
| Trading Post | 777 Baltimore St | Gift Shop |
| Gettysburg Quilting Center | 523 Baltimore St | Gift Shop |
| Confederate States Armory/Museum | 529 Baltimore St | Gift Shop |
| Blue & Gray Gift Shop | 531 Baltimore St | Gift Shop |
| Tour Center | Baltimore St | Gift Shop |
| Jellysburg PA | | Gift Shop |
| Soldiers National Museum | 777 Baltimore St | Gift Shop |
| Hall of Presidents | 789 Baltimore St | Gift Shop |
| Aces High | 421 Baltimore St | Gift Shop |
| Gettysburg QuarterMaster | 419 Baltimore St | Gift Shop |
| Farnsworth House | 401 Baltimore St | Gift Shop |
| Dirty Billy's Hat Shop | 430A Baltimore St | Gift Shop |

Museums & Tours (within 2/5 mile of Visitors Center)

| | | |
|---|---|---|
| The Battle Theater | 571 Steinwehr Ave | Museum |
| Lincoln Train Museum | 425 Steinwehr Ave | Museum |
| National Civil War Wax Museum | 297 Steinwehr Ave | Museum |
| CCInc. Auto Tape Tours | 297 Steinwehr Ave | Battlefield Tour |
| Colt Museum | 241 Steinwehr Ave | Museum |
| Battlefield Military Museum | 900 Baltimore Pike | Museum |
| National Tower | 999 Baltimore Pike | Museum |
| Magic Town | 49 Steinwehr ave | Museum |
| Historic Tours | Steinwehr Avenue | Battlefield Tours |
| Greystone's History Emporium & Gallery | 461 Baltimore St | Museum |
| Jennie Wade House | Adjacent to Holiday Inn | Museum |
| Confederates States Armory/Museum | 529 Baltimore St | Museum |
| Hall of Presidents | 789 Baltimore St | Museum |

## COMMENTS

## RESPONSES

**Lodging (within 2/5 mile of Visitors Center)**

| | | |
|---|---|---|
| Home Sweet Home | 585 Steinwehr Ave | Motel |
| Howard Johnson's | 301 Steinwehr Ave | Hotel |
| Quality Inn | 380 Steinwehr Ave | Hotel |
| Colton Motel | 232 Steinwehr Ave | Motel |
| Budget Host | 205 Steinwehr Ave | Motel |
| Gettystown Inn | 71 Steinwehr Ave | Bed & Breakfast |
| Econo Lodge | 945 Baltimore Pike | Motel |
| Heritage Motor Lodge | 64 Steinwehr Ave | Motel |
| The Tannery | 451 Baltimore St | Bed & Breakfast |
| Brickhouse Bed & Breakfast | 452 Baltimore St | Bed & Breakfast |
| Holiday Inn | 516 Baltimore St | Hotel |
| Homestead Lodging | 783 Baltimore St | Motel |
| Farnsworth House | 401 Baltimore St | Bed & Breakfast |

Underlining & Notes were done by Gerald Bennett

March 6, 1998

Mr Gerald Bennett
Chairman, Advisory Commission
Gettysburg National Military Park
P.O. Box 1080
Gettysburg, PA 17325

Dear Mr. Bennett,

In accordance with the request of the GNMP Advisory Commission, I offer the following comments concerning the four questions posed to the Peer Review Panel.

*Question 1. "Evaluate the methodology, sources and processes used to understand the extent of landscape change and the significance of features to the outcome of the battle."*

Response: Using the terrain-evaluation process known in the military as KOCOA, the ranger-historians of GNMP have done a superb job of analyzing the significant terrain features of the battlefield and assessing their impact upon military operations that occurred in 1863. The base maps will be especially useful in the interpretative process. Scott Hartwig, Eric Campbell, Kathy Harrison, and others who worked on this study should be commended for their efforts.

*Question 2. "Suggest improvements to the methodology, sources and processes."*

Response: My suggestions are limited to five areas. **First**, the base maps and any accompanying narrative should differentiate between "key terrain" and "decisive terrain." For example, both Little Round Top and Big Round Top are key terrain features, but the outcome of the July 2 battle on the Union left was determined on Little Round Top due to the fields of fire that its western slope provided. **Second**, a base map should be drawn that includes the view sheds of the battlefield. "Observation" should be interpreted not just in the military sense, but also in the preservation sense. **Third**, areas that were used for logistical purposes (hospitals, ordnance parks, main supply routes, headquarters, etc.) should be included on the KOCOA map or on a separate map, even if these areas are not within the park boundary. **Fourth**, a larger area map should include areas such as Hunterstown and Brinkerhoff's Ridge. **Fifth**, I would suggest that the "finished product" of this process be sent to the U.S. Army Command and General Staff College (*not* the Army War College, which is more concerned with the strategic level of warfare as opposed to the tactical and operational levels) to allow their experts to evaluate it.

*Question 3. "Advise if the process NPS has developed is a sufficient basis for General Management Plan level decisions."*

Response: Yes, if the suggestions made by the Peer Review Panel are incorporated. In addition, it would be prudent to incorporate a separate study in which all of GNMP's previous land restoration/preservation efforts are detailed, such the removal of the non-historic rail lines running

through the park, the demolition of non-historic buildings, and the replanting of historic vegetation patterns, to name a few.

*Question 4. "Advise if there is evidence of battle action or battle activity that we have missed in our evaluation of the LeVan and Fantasyland tracts."*

Response: This question should have been posed to non-NPS historians *before* a successful bidder was named, not after, lest the Peer Review Panel's comments be interpreted merely as a "rubber stamp" to the NPS decision. Nevertheless, I make the following observations:

- Although there appears to have been no actual combat on the property, the close proximity of Union artillery batteries to the site, as well as the fact that the area sits between the Union "center" and "right" make it a less-than-desirable site for a visitor's center complex. Certainly hundreds, if not thousands of combat and logistical troops passed over the area or bivouacked on the site.

- When the Army of Northern Virginia bombarded the Union center on July 3, many (if not most) of the artillery projectiles went far beyond their intended targets, landing instead in the area to be developed.

- Units reinforcing parts of the Union line would normally take the shortest route between two points, making the LeVan site a likely "avenue of approach" on both July 2 and 3.

- There has been far too little scholarship on the role of logistical operations at Gettysburg. The LeVan tract and Fantasyland sites are located in what would be prime areas for ordnance and subsistence distribution. Also, the area most likely would have been traversed by stretcher bearers as they took their comrades to field hospitals in the rear. Until more study has been done about logistical operations during the Battle of Gettysburg, it might be wise to locate the new visitors complex in an area where we are *absolutely certain* that nothing happened.

*If* the NPS decision is to go ahead with the current proposal, I think it would be more acceptable to locate the complex on land that already has been compromised (ie., built upon), such as the Fantasyland site. I wholeheartedly support the NPS's efforts to remove the current Visitor's Center from Cemetery Ridge; I just am not happy with the fact that such a large complex is going to be constructed on pristine land that, to the best of my knowledge, has never been disturbed.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

Mark A. Snell
Director, the George Tyler Moore Center for the Study of the Civil War
Shepherd College

28 January 1998

Gerald Bennett, Chairman
Gettysburg National Military Park Advisory Commission
Gettysburg National Military Park
P.O. Box 1080
Gettysburg, PA 17325

Dear Mr. Bennett:

The session at Gettysburg on 24 January was most interesting and enlightening. I was honored to be there and to meet you and other members of the commission.

It seems to me that the (Question 1) methodology sources, and process to understand the battlefield terrain are quite adequate. As I ponder what I think that I heard and saw in the course of the presentation, I am inclined to wonder if there might be overkill in the use of the Army's KOCOA process. Yet, if so, this would be erring on the side of caution, and I would yield to the judgement of the planners judgment on this.

I have no improvements to suggest. The answers available must come from a judicious use of maps, photographs, and written source materials. These sources have been examined. The written materials should be examined as thoroughly as possible, particularly for information on fences and crops. The armies destroyed a lot of the fencing, which might not have been replaced, and crops changed. I am sure that the park planners and historians are aware of this.

I believe that the final product will be an adequate basis for decisions. Whether or not the necessary decisions will be made on the basis of the plan is another matter that must be closely monotored. It seems to me also that there should be a provision for changes in the plan based on any new and better information that might be uncovered from time to time. I presume that there is a mechanism for this.

I don't recall many references to the use of the Fantasyland and LeVan tracts during the battle. However, it is apparent that they were busy places during the battle. The eastern portion of the Levan tract, as is known, had an integral part in the battle on Culp's Hill. Two batteries, Kinzie's and Rugg's, occupied the swell of ground on or near where they are marked and from there they covered the open swale toward Spangler's Spring and on the morning of 3 July shelled the Confederate forces on the lower crest of Culp's Hill. During the battle the batteries were supported by Union infantry regiments posted along the east side of the tract and along the Baltimore Pike. The batteries and their supporting infantry were an integral part of the Union

2

line that sealed off the Confederate penetration of the evening of 2 July and eliminated it on the following morning. A map showing this use of the tract accompanies the report of Brig. Gen. Thomas Ruger (OR 27,(1): 779) and is mentioned in the report of Lt. Edward Muhlenberg on page 870. I addressed their presence there in my Gettysburg: Culp's Hill and Cemetery Hill pages 285-287. Reference to this use may be found in other reports and accounts.

When the U.S. Second Corps arrived on the battlefield on the morning of 2 July, General Meade ordered that it be positioned east of the Taneytown Road, facing east. It remained here about one hour before moving to Cemetery Ridge. Because this area was occupied for only an hour, no one described the corps' location except that some units were posted in a woods--that by the Cassatt buildings, no doubt. This brief occupation is mentioned in my Gettysburg: The Second Day, page 61.

Insofar as major troops movements are concerned, the subject tracts were probably traversed by Lockwood's and McDougall's brigades on 3 July when they went from their positions south of Culp's Hill to reinforce the Union center during Pickett's Charge. General Meade probably crossed them also when he moved his headquarters from the Leister house to Powers hill during the shelling preceding Pickett's Charge.

In addition to these specifics, the location of these tracts in the center of the Union position meant that the must have been heavily used to park wagons and other impedimantia brought to the field by the Army of the Potomac. They must have been shelled heavily by rounds intended for the line on Cemetery Ridge but fired high. Although these uses in themselves would not convey national significance, such uses coupled with the tracts' association with the positions on Cemetery Ridge, Cemetery Hill, and Culp's Hill enhance their importance in the preservation of the battlefield. Apart from their uses during the battle, adverse development of these tracts in the heart of the battlefield would be abhorrent.

I have long been concerned about the development along the Baltimore Pike. Some of these private tracts will have to be acquired to permit the restoration of the Culp's Hill historic scene--the garage at Hunt Avenue and the pike and the the large tracts on the west slope of the hill itself for example. Control of others will probably be necessary to forstall adverse development.

Sincerely,

Harry W. Pfanz

Advisory Committee Meeting Report
by Richard Rollins

Gettysburg National Military Park is now engaged in a project that is long overdue, and holds great promise for the future of the park. Upon completion, it will establish an objective, factual basis for future important decisions shaping the management of the Park. This is a major step towards achieving a comprehensive plan for the park's long-term management.

The methodology and process developed here could enhance the decision-making process for all national parks. The process includes developing all information pertinent to the natural and cultural resources in the park. The methodology focuses on the development and mapping of three types of information.

*creating base maps for four periods of time, showing the park as it was at a given point, and thereby providing the material to be used in studying the changes that have occurred on the battlefield of Gettysburg since 1863.

*an evaluation of the areas of the field according to the levels of combat that occurred there.

*an evaluation of the topography from the perspective of its military value, using a system developed by the U.S. military.

I was extremely impressed with all aspects of this project. When completed, it will achieve the goal of providing a set of objective, factual data that will help those who are entrusted with the management of the park in the future. It will also serve as a model for all other sites managed by the National Park Service.

The GNMP staff on this project are obviously committed to their work and going about it in an effective, professional manner. I found them to be bright, thoughtful and articulate.

The budget for this project should be doubled and the staff assigned to it should be doubled. Each section of the project should have two, or more, individuals working on it, not one. Two heads are always better than one. At the bare minimum, an individual at least as knowledgeable as the primary researcher should be available to check and recheck the work. Intellectual efforts of any sort by one person inevitably reflect the subjective perspective of that person. Having a second person participate in the development offers one way to correct at least part of this problem. An individual can never think of everything, no matter how capable and thorough their work. It would not hurt to have the maps subjected to a committee for review. It would not hurt to hold two or three forums for the public to review the maps before they are completed.

This may be prohibited by budgetary restrictions. I suggest that outside volunteers be called upon to work with the people involved. This would take extra time, but this project is so important that it should not be rushed, and should be as carefully completed as it has been carefully designed.

The official goal of the General Management Plan should be to return the park as closely as possible to its condition in 1863. While this goal can never be fully achieved, all efforts should be guided in that direction, and reasonable decisions should be made with it in mind. The information developed in the evaluation and development process will serve perfectly as a guide for this objective.

Observations, Suggestions and Random Comments

A. If one sifts through the massive secondary literature on the Civil War and the battle of Gettysburg, it soon becomes clear the for most historians, significant combat is defined as the clash of infantry. This leads to conceptual problems, and, specifically, the undervaluation of (and thus the misunderstanding of) the role of artillery. This problem

# COMMENTS

# RESPONSES

2

appears on the maps of battle action on all three days.

Perhaps this can be seen most clearly on July 3rd. On that day occurred the heaviest artillery action of the war. Artillery played a major part in the planning of the attack and in the planning of the repulse of the attack. On that day the bombardment was as important as the infantry. Yet on the map it is marked as "moderate action with a medium number of casualties." The only areas marked as "major action" are the infantry areas.

I suggest that the ranking levels of combat be rethought, and that the artillery be considered and marked as equal in importance as the infantry. This should be done not just for the cannonade on July 3rd, but for the entire battle. For example, on the battle action map the entire Baltimore Pike artillery line is simply ignored. Yet this was a key part of the Federal defenses. The guns on Kimmie's Knoll, Powers Hill and McAllister's Hill played a key role in the defeat of the Confederate attack on Culp's Hill; both Federal and Confederate reports so indicated.

The same must be said for the KOCOA Elements map. Artillery positions are again defined out of existence. For example, Stevens' Knoll and Powers Hill are marked as "key terrain" with a crossed flags, indicating a signal station. It was also key terrain for artillery, as was Kimmie's Knoll. Yet it is not so marked, and it should be.

Likewise the Peach Orchard on July 3rd. Gen. Robert E. Lee said in his report that the capture of the Peach Orchard was the factor that convinced him to continue the attack, and thus provided the basis for developing what we now know as Pickett's Charge. Yet it is not "key terrain."

In effect, the definition of "key terrain" is terrain where infantry fought, or signal stations were located. The definition should be changed to reflect the importance of artillery. Hunt and Meade clearly considered the positions of artillery as important as infantry.

B. Since this process is designed to create a permanent record of what is of historical significance, you should also mark Headquarters sites and hospital sites. Perhaps a fourth set of maps, or a single map, could be drawn up to indicate these as well. Of course most people want to see locations of "blood on the ground," but that does not mean other sites were and/or are of little importance. Surely Lee's Headquarters and the Leister house, for example, deserve long-term preservation. All of the Gettysburg area will come under development pressure in the coming decades. The ONLY chance some of these places will have for survival is the GNMP's recognition of their importance.

C. The Federal defensive line designed by Meade, Hunt and the infantry corps commanders was, as Brig. Gen. Alpheus Williams said in his report, a "defensive triangular army formation." The base of the triangle extended from McAllister's Hill on the far right of the Federal line, to the area known today as the South Cavalry Field. This important tactical line of ten units, combining infantry, artillery and cavalry, has been largely forgotten, but should be marked on all maps.

It is important to note that this was a tactical line deliberately set up to take advantage of the terrain and to protect the Army of the Potomac's southern flank. All batteries placed their guns on high ground and took advantage of other features of the terrain. Those units on the east and west flanks became engaged. In addition, because Hunt and Meade wanted the rifled guns in the center of the lines, all these guns were smoothbores. The flanks of this line faced north, while the interior faced south. (See Appendix)

D. The current process of developing the General Management Plan is of extreme importance for the future of the GNMP. As part of that process, this meeting was also important, as will be any additional such meeting. More time is needed to fully analyze the concepts and to look more closely at the maps. I wish the meeting had been organize differently in one or two ways. The maps and supporting material should have given out at least one month before the meeting. If that was not possible, a second meeting of the same group should be held at least one month after the original, after we have had time to evaluate everything. I'll have lots more to say, and be prepared to discuss more issues in depth,

with more time to study all the material.

E. This can be extended to cover the rest of the process. This is an enormously important project for GNMP and could serve as a model for the rest of the NPS sites. Take your time and do it as well as you possibly can. It is something that will continue to have impact long after any of the committee members are around, so take your time. Furthermore, the concept of using non-affiliated historians to review this process should be continued. Those who participated in this meeting have invested time and effort. Don't waste it. Call on at least one or two to continue reviewing the committee's work.

F. For the record, Kinzie's Knoll was an important artillery site on July 2nd and 3rd, and must not be compromised in any way. Since the Knoll has been "saved" at least for now, the NPS should attempt to purchase this property (if the new VC doesn't end up on the Levan Tract) and develop an in-depth artillery interpretation site. This site should deal with the conceptual aspects of artillery, not the details of types of weapons and ammunition.

G. Gettysburg is one of America's most precious resources. The GNMP appears to organize its facilities and manpower to deal with the majority of the tourists who visit, and that is certainly understandable. It also overlooks an important part of its constituency. Gettysburg is not of value just to the novice or first-time visitor. It is also for the person who knows it well and wishes to study the field and battle in some depth. During the meeting Harry Pfanz, the most accomplished living historian of Gettysburg, told me that he frequently spends time on the battlefield by himself, in "quiet contemplation" of specific problems he wants to write about. I know many others who do the same. The battlefield is there for Harry Pfanz as well as Joe and Mary Smith from Dubuque. Allowance should be made for this. I intend to write a letter in the near future giving a few ideas on how this can be done, and in the meantime diffuse some of the "town-gown" friction that exists in Gettysburg and reduce some of the antagonism that the Park now faces.

H. The battlefield of Gettysburg is unique, and GNMP holds enormous attraction for a significant segment of the population. There are individuals all over the country that have an in-depth knowledge of the field itself and a serious interest in the events surrounding its management. No doubt many would be not only willing, but very pleased to be of help. Given the budgetary situation, more should be made of this. I understand that there is always a tradeoff: the organization of volunteers is time-consuming and somewhat risky. On the other hand, the use of specific knowledgeable individuals willing to work on their own, uncompensated (or reimbursement for expenses), could be done more frequently than it has been done.

I. Finally, when this project is finished, GNMP should put all material together for future managers and make it available to all employees of the park and citizens with an interest in the park.

Appendix:
The Federal Line, South End

The line was divided into three parts. Reading from east to west, the line consisted of the following units:

1. The 16th Pennsylvania Cavalry, commanded by Lt. Col. John Robinson, of the 2nd Brigade, 3rd Cavalry Division. They were located east of Rock Creek, their left connecting with the right of Neill's brigade near todays Lost Avenue, continuing north-northeast toward today's Highland Ave and Wolf's Hill. They engaged against the Stonewall Brigade during their sortie on the afternoon of July 3rd, losing three men. Because of their position on the extreme right of the Federal line, they had vedettes facing north, east and south.

2. Brigadier General Thomas Neill's brigade, 2nd Division, 6th Corps, their left flank just east of Rock Creek, faced north, with the 16th Pennsylvania Cavalry on their right.

3. The six guns of Batteries B & L (consolidated), 2nd U.S. Artillery, Lt. Edward Heaton, commanding, sat below Powers Hill, just south of today's Hospital Road, supporting the 4th New Jersey.

4. The 4th New Jersey infantry regiment supported the 2nd U.S. Artillery.

5. Brigadier David Russell's brigade of the 1st Division, 6th Corps was positioned on the east side of Taneytown Road and Big Round Top, facing due south.

6. Battery C, 1st New York Artillery, Capt. Almont Barnes commanding, from the 5th Corps Artillery Brigade, was placed in the middle of Russell's brigade.

7. Col. Lewis A. Grant's brigade from the 2nd Brigade, 6th Corps deployed west of the Taneytown Road facing south, several hundred yards east of and below Big Round Top.

8. Lt. Aaron Walcott's 3rd Massachusetts Artillery supported Grant.

9. West of and below Big Round Top near Plum Run, on a knoll on the Bushman's farm, and facing north, sat Lt. Samuel Elder's Battery E, 4th U.S. Artillery. As part of the 1st Brigade, Horse Artillery, under Capt. James Robinson, they supported Farnsworth's cavalry brigade of Kilpatrick's division.

10. Five regiments from Brig. Gen. Wesley Merritt's Reserve Cavalry brigade stood about three-quarters of a mile south of the present intersection of the Emmitsburg Road and West Confederate Avenue.

11. Capt. William Graham's Battery K, 1st U.S. Artillery, facing due north and supporting Brigadier Merritt's cavalry brigade, was placed on a knoll east of the Emmitsburg Road and about one mile south of West Confederate Ave.

Mr. Ronald Bennett, Chairman
Gettysburg National Military Park Advisory Commission
Post Office Box 1080
Gettysburg, PA 17325

Dear Chairman Bennett:

I, as requested, responded immediately to point 4 of the issues listed in the paper distributed at the January 23 briefing presented by park staff and planners. Because of a heavy travel schedule, I shortly submit my responses to points 1-3. They are:

1) Evaluation of the methodology, sources, etc.... The park's knowledgeable and worthwhile staff, employing a multi-disciplinary approach, along with computer and GIS technology, has utilized diverse sources -- documentary, iconographic, etc -- to focus on the cultural history of the area from prehistoric to the present. Their work resulted in preparation of four historic base maps representing the cultural landscape of the park and its immediate environs in these years -- 1863, 1895, 1927, and 1993 -- years associated with significant phases in the park's development and interpretation. Utilizing these maps, it is possible to list, note, evaluate, and understand changes in the cultural landscape and relate them to changes in agricultural technology, park practices, interpret-



Organization

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| ation, etc.<br>The development and application of KOCOA to the base maps provides graphically an understanding of categories of troop movements and battles and significance actions as they apply to the cultural landscape and terrain.<br>KOCOA, in conjunction with the four historic base maps, provides park management and the public with invaluable tools for informed decision-making rather than conjecture. If park management and the public had been privy to this type of data, I believe that the 1981 decision to locate the Exploration Center adjacent to the Highwater Mark and in 1989 to proceed with that part of the land exchange involving the B&O railroad land would not have occurred.<br>(2) I enthusiastically enclose the methodology, process, and sources used by park staff in preparation of the four historic base maps and KOCOA.<br>At his January 23 briefing, insofar as KOCOA was concerned, I recommended that attention must be given to artillery concentrations/groupings and their fields of fire that were significant. Such attention would lend significance to the artillery concentration along the high ground west of and parallel to the Baltimore Pike | |

identified by David Shultz and Richard Rollins in their publication The Baltimore Pike Artillery Line and Kruger's Knoll. This recommendation was endorsed by Gen. Harold Nelson and the park staff was incorporated into the GMP.

(3) It is my view that NPS has developed a satisfactory data bank for General Management Plan level decisions.

Edwin C. Bearss

| COMMENTS | RESPONSES |
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To: Harold Barnett, Chairman, Gettysburg NMP Advisory Commission
From: Edwin C. Bearss, Historian Emeritus
Subject: Significance of Levan Tract

On Friday, January 23, 1998, at the invitation of the Gettysburg National Military Park Advisory Commission, I was briefed by park staff as to the methodology employed in developing a series of historical base maps depicting the battlefield area in 1863, and its landscape 1895, 1927, and 1993. The methodology embraced KOCOA which was outlined and the resulting maps reviewed and discussed. After the briefing, I walked Artillery Ridge, keeping on hand David Shultz and Richard Kollmo's report: The Battlefield's Artillery Line and Kuntzes Knoll.

The briefing and walk with the battlefield gained during the last 32 years and documentation presented satisfies me that the Levan Tract would be a proper location for the Cyclorama and Visitor Centers than their current locations. The Levan Tract, if developed with care, is far less intrusive on the core areas of the battlefield. Excepting U.S. artillery positions on Artillery Ridge and Kuntzes Knoll, troop movements east and west across the Levan Tract were not of overriding significance to the battle. The trade off of development of the Levan Tract as a center for visitor facilities to facilitate their relocation from south

Cemetery Ridge and Zeigler's Grove and the restoration of those keystones to their appearance circa 1863 is vital to an understanding and appreciation of what happened on this hallowed battlefield in July 1863.

If the Levan Tract is to be developed as proposed, the NPS must insist on:

(1) The preservation and better interpretation of the ~~and significant~~ artillery positions on Artillery Ridge, extending southeast from the Cemetery Hill to Powers Hill, including Kuhn's Knoll.

(2) Siting of the Levan Tract facilities must not intrude on the viewscape from the Baltimore Pike west to Kuhn's Knoll and Artillery Ridge. ~~and~~ Steps should be initiated by the NPS to open viewsheds from Kuhn's Knoll toward Culp's Hill.

(3) Kinsley Equities must be encouraged to acquire the inholdings along the Baltimore Pike that front the Levan Tract.

## COMMENTS

January 26, 1998

Mr. Gerald Bennett
Chairman
Gettysburg NMP Advisory Commission
Post Office Box 1080
Gettysburg, Pennsylvania 17325

Dear Mr. Bennett.

Thank you for including me in the panel of historians that convened at Gettysburg National Military Park on January 23 to advise the commission regarding the historical data that park staff has developed. While I had ample opportunity to present my views during the meeting, I am writing this letter so that you can share my summary of those views with any interested party. I have structured the ensuing comments around the requirements set forth in the handout used at the meeting (enclosed).

**Landscape changes**

A. Methodology. I applaud the use of all available sources to build digitized maps that will reflect all details that can be known about the terrain significant to the battle of Gettysburg. The careful annotation of sources on the research versions of the maps allows future research to build efficiently on work already completed. Using 1863, 1897, 1927, and 1993 as the data collection years makes sense. It allows specialists and laymen to consider both general trends and specific details of landscape changes. It highlights the importance of past management decisions that have literally shaped the landscape, providing a helpful resource for the ongoing discussion of preservation and restoration options.

B. Sources. Maps, panoramic drawings, photographs and participants' accounts are being used appropriately. The sources available exceed the time thus far invested in the analysis, but continuous improvement in the maps is readily accommodated by the methodology.

C. Process. The "process to understand" is excellent because it results in maps that communicate enormous amounts of detail in numerous combinations. The actual process of building the maps makes wise use of digitization to give tremendous ability to modify, refine, publish, and distribute key information.

**Significance of features.**

A. Methodology. The KOCOA interpretive method combined with traditional troop location/movement gives an excellent framework to determine significance of landscape features.

B. Sources. The perfected 1863 map will be the ideal terrain source for the KOCOA method. Troop location/movement sources can be used exhaustively as candidate "significant features" emerge.

C. Process. Since the same digitization process is used here as in the 1863 base map, this process enjoys the same advantages.

## RESPONSES

**Battle action on LeVan and Fantasyland tracts.**

I know of no evidence of battle action or battle activity that NPS historians have missed in their evaluation of the LeVan and Fantasyland tracts. I understand that some are asserting that artillery positions of potential value on July 2, 1863 and of actual significance in the battle action on Culp's Hill early on July 3 are included in the LeVan tract. I do not think these assertions are correct. I think the monument to battery K, Fifth U.S. Artillery [Kinzie's Battery] is properly placed near the northeast corner of that tract. Those who assert that this battery was on the ridge about 200-250 yards west of this site do not seem to have studied maps or the ground very carefully. That ridge does not rise above the height of the marked site until it crosses modern-day Hunt Avenue. While shot from a battery position on that ridge could have cleared the marked site if fired toward Spanglers Spring or the contested area on Culp's Hill, I can see no reason why an artilleryman would attack such targets from a greater range. In addition, this putative artillery site would be relatively difficult to access in 1863--Hunt Avenue did not exist, and pulling into the high ground near the Baltimore Pike would make far more sense. The declevity between the marked site and the ridge to the west would be the ideal place for caissons and limbers supporting a battery placed near the monument.

If the Visitor Center is placed on the LeVan site, all of this can be easily interpreted without disturbing any significant terrain, thus increasing visitor understanding of the artillery action along the Baltimore Pike

If I can be of any further service, do not hesitate to call upon me. Telephone (717) 243-3502, Fax (717) 243-7044.

Sincerely yours,

Harold Nelson, PhD.
BG, U.S. Army (Retired)

| COMMENTS | RESPONSES |
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| Suggested improvements.<br>A. Methodology. Begin intensive research on the 1863 base map for those locations where significant features seem to merit detailed work. For instance, Confederate General Alfred Iverson's report of the first day's battle says that he attacked forces "strongly posted in woods and behind a concealed stone wall." [Official Records, Series I, Volume XXVII, Part 2, p. 579] The 1863 map we were given at the meeting is a bit difficult to use since it lacks contour lines, but it appears to show a stone fence on the ridge where Robinson's Union division met Iverson's attack that has been significantly realigned to allow traffic flow in later maps. Projecting the battle action overlays on the 1863 base maps as well as the 1993 base maps would highlight areas where this research is needed.<br>I think the researchers should consider maintaining a list of "puzzles" and "gaps." Research of this type always results in conflicting evidence that produces puzzles where further research may shift the weight of evidence toward a solution. At the same time, there are often gaps in our knowledge because earlier chroniclers omitted aspects of the battle action that interest us. If these challenges were listed, specialists might be able to provide useful information.<br>B. Sources. As I said at the meeting, I recommend that the NPS employees engaged in this work establish contact with Colonel Leonard Fullencamp and his military history colleagues at the U.S. Army War College as a source for discussion of your efforts to apply KOCOA to an historical battlefield. Colonel Fullencamp has been leading "staff rides" with military groups at the Gettysburg battlefield for nearly a decade, but he is also involved in teaching modern Army methods He will be able to provide up-to-date contacts throughout the Army while also giving thoughtful input to on-going analysis I have talked to him about this, and he is very willing to help. He can be reached at (717)245-3307.<br>I learned after the meeting that NPS staff members are already connected to the faculty at the U.S. Military Academy at West Point. Those contacts should be broadened. Geographers and historians on that faculty can be very useful to the research now underway.<br>C. Process. I believe the "process of understanding" can be improved by using the maps already available in public meetings and presentations. I believe NPS personnel should be encouraged to use modern projection equipment linked to a laptop computer to present more information about past modification of landscape to interested parties. I think specific terrain features could be highlighted on the Gettysburg NMP website. The underlying process of analysis does not require improvement. | |
| **Relationship between Process and General Management Plan decisions.**<br>I believe the process demonstrated on January 23 provides appropriate historical input for General Management Plan decisions. Many people who are providing "overwatch" on the GMP would benefit from having access to the process and its products. Many of us know too little about the ways in which terrain has been modified since 1863, and I think all parties to the discussions would make more meaningful contributions if they were better informed.<br>We also discussed the broader process by which the National Park Service is gaining input to its GMP decisions. I am concerned that the public meeting format gives local interest undue influence on decisions. Granted, it is the local citizens who must live with the Park, but the Park is a national resource. The web site and mailing lists elicit broader input, but every additional means must be sought to broaden that input. | |

PEER GROUP OBSERVATIONS

First, let me begin by stating that it is both necessary and proper that the National Park Service build a visitor center complex in conjunction with private enterprise at Gettysburg National Military Park. The current facilities are inadequate, in desperate need of repair, and are located on historically sensitive ground.

Accepting the need for a new facility, the next and much more critical question is where do you put it? Although philosophically opposed to any further construction on the hallowed ground at Gettysburg, whether the ground is within the park boundaries or not, I am enough of a pragmatist to accept the reasons presented by park service officials why they must locate the proposed facility within current park boundaries.

Having selected the Levan Property near the Baltimore Pike, the next step, as I understand it, is to determine if the position is historically important enough to the story of the battle of Gettysburg to exclude it as a possible site for the proposed visitor center-museum facility. In order to answer this question the National Park Service has developed a methodology that will coldly, rationally determine the historical importance of the Levan Property, or any other property for that matter. To test the validity of the methodology and the conclusions this methodology has produced to date, the park advisory commission and park officials held a "peer review" of the process composed of selected historians.

The methodology developed is as impressive as it is unprecedented. A series of maps were created which show the physical features of the Gettysburg area at various time periods (1863, 1895, 1827, and 1993), battle action, and key terrain as determined by concepts developed by the United States Army. Battle action is divided into three levels of intensity or, by implication, significance; major, moderate, and minor. By triangulating these three criteria it is believed that the significant ground at Gettysburg National Military Park, or any other historic site for that matter, can be identified. Taken at face value this method looks impressive. It is certainly better and more thorough than anything the National Park Service has developed so far to my knowledge There is a pitfall however. Not all battle action occurred on key terrain and not all key terrain hosted battle action. And therein lies the trap. It is impossible to reduce human experience, especially the experience of battle, to mere statistics. If we only preserve the battle that was and not the battle that might have been, we are creating a sterile, unfeeling shrine which will have little, if any, meaning to future generations. Perhaps differentiating between what was a battle position and what was not would be a more valid criteria for terrain analysis. In any event, the input of a peer groups composed of knowledgeable persons, whether they be noted historians, guides or just local residents, is essential to whatever methodology is adopted. After all is said and done, the parks belong to the people of the United States of America and not the National Park Service. Therefore, it is essential, in my opinion, to have the people get involved in the decision making process. If nothing else, it makes good public relations sense.

There was an artillery position on the Levan Property erroneously referred to as Kinzie's Knoll. (The position is not a knoll but a ridge, and, furthermore, Rugg's Battery was there as well.) This position saw little if any action according to the methodology described above, but the guns positioned there on July 3, 1863, contributed

## COMMENTS

significantly to Union victory in the battle of Gettysburg.

The action on the Union right flank has largely been overlooked by historians, visitors, and park officials. It was not so long ago that the area was classified as a class C area by the managers of the Gettysburg National Military Park, the lowest priority rating for determining the a location of maintenance resources and spending in general. Despite the fact that action along the Union right is largely overlooked today, control of Culp's Hill was vital to the Union position. After the first day's accidental, chance encounter, the story of the battle of Gettysburg is simply the story of three hills - Little Round Top on the Union left, Cemetery Hill in the center, and Culp's Hill on the Union right. Of these three hills, Cemetery Hill was the key to the Union position and Culp's Hill, not Little Round Top, as most people believe today, was the key to Cemetery Hill. In a speech delivered after the war, General Daniel Sickles stated, "if the enemy could have secured this position [Culp's Hill], which dominated Cemetery Hill ... their artillery [on Cemetery Hill] would have made our line on Cemetery Ridge untenable." Alpheus Williams who commanded Union troops involved in the struggle for the Union right on Culp's Hill would have agreed with General Sickles. In a letter written to John Bachelder he stated, "Had [the Confederates] succeeded in forcing our lines[on Culp's Hill], and getting a foot-hold on the Baltimore Pike... it requires no great stretch of fancy to imagine the direful consequences."

Because of its importance to the Union position, the struggle for Culp's Hill was severe and prolonged. During the Battle of Gettysburg the longest, sustained fighting occurred on Culp's Hill on the morning of July 3, 1863. As recounted by Lt. Col. Fox of the 107th NYVI:

> It was a remarkable fight. for seven hours the unremitting roar of rifles continued along the front of the Twelfth Corps.... It was the longest continuous fighting of any made at Gettysburg.... At no place on the field did the dead lie thicker than along the front of Geary's Division.... The effect of the musketry on the forest was visible for many years in the dead and dying trees, few of which survived the countless scars inflicted during this storm of bullets and cannon shots."

The artillery of the Twelfth Army Corps of the Army of the Potomac arranged along the Baltimore Pike by Clermont Best and Alpheus Williams played an important part in this struggle. As General Williams recalled the batteries were put in position, "Muhlenburg [Rugg] and Kenzie, with 10 pieces brass Napoleons, on an elevated piece of ground near the Pike just above my Hd. qrs. [the ground where the batteries markers are today] and the other batteries of the corps on Power's and McAllister's hills." Muhlenburg reported that his guns opened fire at 4:30 a. m. on the morning of July 3, 1863, and continued firing at intervals until well after 10:00 a. m. when the Confederates retreated from Culp's Hill. Muhlenburg believed that, "The artillery was of essential service, and did excellent execution at this part of the field, and no doubt contributed greatly in preventing the enemy from establishing himself in so desirable a position, whence he could have either have held the pike or have moved his force along the southeast slope and occupied a sufficiency of Cemetery Hill to annoy, if not to entirely control, the position held by the army."

Confederate accounts agree with Muhlenburg's belief that Union artillery did

## RESPONSES

essential service. Randolph McKim of the 1 Md Confederate related, "The men were mowed down with fearful rapidity, by two lines in front and a force on the left flank, besides an artillery fire from the left rear." A member of Daniel's Brigade remembered, "This day none will forget, that participated in the fight. It was truly awful how fast, how very fast, did our poor boys fall by our side - almost as fast as the leaves that fell as cannon and musket balls hit them, as they flew on their deadly errand." Captain James Parran Crane, First Maryland Infantry (Confederate) recalled that his regiment was ordered to take cover behind the captured Union breastworks because of "the severe and accurate shelling of the enemy."

Although firing into woods, it seems most of the Union artillery rounds found their mark. The gunners along the Baltimore Pike took advantage of forward observers among the Union infantry. Colonel Wooster of the 20th Conn was able to "repeatedly communicate to the colonel commanding the brigade and the general commanding the division the movements of the enemy in our immediate front, thereby enabling our artillery to more accurately obtain the range of the enemy and greatly increase the effectiveness of our shells." This account is one of the very few references to the use of forward observers in American Civil War of which I am aware. This duty was not without risks as several regiments in close proximity to the Union artillery fields of fire reported casualties caused by their own guns.

I have no doubt that the guns referred to by both Union and Confederate accounts were arranged on the Baltimore Pike and that Kinzie and Rugg were located on part of the Levan Property. In a letter written after the war by Colonel John M. Wilson of the Public Works Office to Samuel Bushman who owned a farm along the Baltimore Pike, Colonel Wilson says, "Battery F. 4th Arty, Lt. Rugg comdg. and Battery K 5th Arty, Lt Kinzie Comdg. occupied positions in your field, west of the Baltimore Turnpike and south of your barn.... At this locality, the plot is located about 300 ft. from the Baltimore Turnpike and the line fence runs right through it..." The position occupied by Kinzie and Rugg was the only position along the Baltimore Pike that afforded fields of fire into the Confederate lines on Culp's Hill and Spangler's meadows. Both Generals Slocum and Ruger included maps of the positions of the Twelfth Army Corps at Gettysburg that appear to confirm the location of Kinzie and Rugg as documented by the War Department.

Having established the position of Kinzie and Rugg on part of the ground proposed for the new visitor center-museum complex, it is recommended that this site be interpreted rather than developed. The rest of the tract is of less significance as a battle position and could provide for the new complex if tactfully done. The real concern, as I see it, is what is going to happen to the rest of the property along the Baltimore Pike which at the moment is privately owned and, for the most part, outside the boundaries of the Gettysburg National Military Park. The ground along the Baltimore Pike from Cemetery Hill to Rock Creek should be preserved and returned to its 1863 appearance. If the National Park Service does nothing to prevent this area from being developed, whether or not the new visitors center is placed on the Levan Property, it will have committed a crime against the American people greater that allowing the National Tower to be constructed or permitting Gettysburg College to rape Oak Ridge

Charles C Fennell Jr

| COMMENTS | RESPONSES |
| --- | --- |

Feb. 9th 189

Mr Lignel Buchan
Gettysburg Penna

Dear Sir:

The General Government desires purchase certain small plots of land on the battlefield of Gettysburg for the purpose of erecting monuments or tablets to mark the positions held by the troops of the respective armies in that engagement.

Battery H. 4th Arty, Lt. Rigg Comdg. and Battery L. 5th Arty, Lt. Kinzie Comdg, occupied positions in your field, west of the Baltimore turnpike and south of your barn.

The U.S. desires to purchase a plot 50'x70', containing 3500 sq. ft. At this locality, the plot is located about 300 ft from the Baltimore turnpike and the line fence runs right through it. Will you sell this plot to the U.S. If so what price

[redacted]

PENNSTATE

February 23, 1998

D. Scott Hartwig
Gettysburg National Military Park
Gettysburg, Pennsylvania 17235

Dear Mr. Hartwig:

I have gone through the materials I received at the meeting last week, and I am pleased to offer the following comments. I have organized them according to the list of questions the Advisory Commission supplied to each peer reviewer.

I am most impressed with the methodology employed by the NPS staff in seeking to understand and map changes in the battlefield's landscape and in relating features of the landscape to the progress and outcome of the battle. The series of maps locating fences (and by extension size and shape of fields), woods, orchards, roads, railroads, streets, and streams in the benchmark years 1863, 1895, 1927, and 1993/9997 cannot be praised too highly. As one who has spent a great deal of time studying the battle and leading numerous tours of the battlefield for students and adults, I have often wished for just such a set of maps that would provide definitive information about wood lines, fence lines, and the like. The amount of work that went into preparation of the maps is very impressive. It combined close study of historic maps, careful evaluation of a mass of testimony from participants in the battle and later groups that sought to mark and preserve (and in some cases develop) the historic ground, and great proficiency with computers. The result is a model of what a talented group of people, each of whom brought a different expertise to the task, can accomplish.

The maps depicting zones of battle action on each of the three days of combat, together with the map that combines the data from those three to offer a composite picture of areas of combat on all three days, convey as much information at a glance as can be gleaned from a great deal of reading in primary and secondary materials. The map depicting KOCOA elements also is very useful, allowing even the uninitiated in military affairs and concerns to grasp why certain points and areas on the battlefield were more important than others.

I cannot offer any suggestions for improvement of the methodology, sources, or process. I can only reiterate that I believe the NPS staff involved in this project pursued their goals of mapping landscape changes and relating terrain to the battle's outcome in an exemplary fashion.

An Equal Opportunity University

Gallagher to Hartwig
RE: Advisory Commission Peer Review

February 23, 1998
Page 2 of 2

Conclusion 1-3

Having said that, it will come as no surprise that I believe the NPS developed a process that provides a more than sufficient basis on which to base decisions at the General Management Plan level.

The final question put to peer reviewers concerns the level of battle action at the LeVan and Fantasyland tracts. I believe the NPS has reached entirely sound conclusions regarding the extent of action on this ground. The historic records clearly indicate that there was minor artillery activity directed toward Culp's Hill from a small ridge near the proposed site for the new visitor center. That action involved a pair of batteries--neither of which suffered any casualties in the action. Union infantry also moved across the ground on July 2 and may have suffered four casualties (that the casualties were suffered on these parcels of ground cannot be determined with assurance). None of the three maps depicting zones of fighting shows even tertiary action on these parcels, and I firmly agree that they should not do so. There simply was not significant action of any kind on either the LeVan or Fantasyland tract.

Should you need amplification of any of these points, please do not hesitate to let me know.

Sincerely yours,

Gary W. Gallagher

Gary W. Gallagher
Professor of American History

Author: (Elizabeth S. Kaszubski)
Date: 9/28/98 11:21 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Question in preparation for the Descendants of the 136th New
---------- Message Contents -----

Dear Dr. Latschar,

Please respond to the following question within the next week so that we may be able to send you a favorable response to the draft management plan. We need a quick response from you, to enable us to meet the deadline for the public comment period. Our group has reviewed the entire document, from the viewpoint of those interested in honoring the soldiers who defended the location of the current Visitor Center. Generally this is a truly great document. We just want to assure ourselves that the NY136th regiment's position won't fall through the cracks.

a We have been reviewing the draft General Management Plan and seem to have found an inconsistency between the Letter of Intent signed by Kinsley (page 327, the first item labeled #4 at the top of the page) and the Projected Cost - Alternative B table (on page 316, item #16). In the former case it states, "To rehabilitate the historic appearance and setting of Ziegler's Grove and the high water mark of the battle by removing the existing visitor center and Cyclorama buildings and THEIR ASSOCIATED ENTRY ROADS and parking, and by restoring the historic landscapes." In the latter case, it shows costs for, "Road modifications to restore Hancock Avenue connection to Taneytown Road (existing Cyclorama Center ENTRY ROAD TO REMAIN TO FACILITATE PARK TOUR ROUTE).

Must the park route really highlight double decker buses passing directly adjacent to the National Cemetery graves? My family member buried there probably would have turned in his grave if he could hear the loudspeakers from the National Tower, without adding crowds of tourists whisking by the cemetery to the sounds of megaphones announcing what an attraction it is. This is a CEMETERY.

Obviously, Hancock Avenue must end somewhere. That road to Taneytown (from Hancock) doesn't belong there in the first place. It is hardly compatible with a restoration of the battle line! The connection to Emmitsburg Road from Hancock is shorter (less damaging to the battle line resource) than the longer connection to Taneytown Road. Diverting the traffic to Emmitsburg would leave it a little quieter next to the cemetery and enable us to visit the monument of the NY136th on Taneytown without risking our lives. Our ancestors have already lived that nightmare in that location.

Actually, the side of the cemetery with the gate house is more touristy. Alternatively, if you must keep the connection to Taneytown, why don't you send the tour buses south (rather than north) towards Hunt Ave, and then wrap around to see the cemetery from Baltimore Pike and the East Cemetery Hill area. That section of Taneytown from Hunt to Steinwehr is pretty treacherous for pedestrians, so this would avoid some of this.

Our primary objective is to ensure that the current Visitor Center, and all its parking lots and roads, are removed within the boundaries of GNMP from the battle line of the NY136th. Their sacred ground has been disgraced long enough. It should be guarantee that if a new center is built that Kinsley MUST tear down the old Visitor Center as soon as everything is moved to the new one. This move should take months, not years. We would like to be there to see the bulldozer finally righting a great wrong on this battle line.



## Descendants of the NY 136th Infantry Regiment

a The discrepancy that you noted between the Letter of Intent with the Gettysburg National Battlefield Museum Foundation and the cost estimate tables listed in Appendix 4 is the result of the evolving process of developing the draft GMP/EIS. The letter of intent, signed by Robert Kinsley, President of the Foundation on July 16, 1998, was signed during the time that the NPS was conducting public workshops and developing the alternatives to the General Management Plan. In response to public input, a new auto tour that will take visitors through the Borough of Gettysburg via Steinwehr Avenue was developed. To do this, it is necessary to maintain the existing Cyclorama Center entry road that connects the northern end of Hancock Avenue with Steinwehr Avenue. The connection of this portion of Hancock Avenue and the Taneytown road is part of the original commemorative avenue system. The development of this new tour route occurred after the signing of the letter of intent. This would not change the intent of the action alternatives, to remove the Cyclorama Center and its parking lot and restore the Ziegler's Grove area of the battlefield.

## COMMENTS

We don't want to hear later that somebody made a compromise with businesses for parking on the NY 136th position, or that budget cuts won't permit full restoration We don't want to hear that the old Visitor Center is more historic as a building than the underlying battle line is. Please assure us that the draft plan, and Kinsley's final contract, will restore the historical battle line of the NY 136th, and, the areas in the immediate vicinity (view shed). There is nothing anyone can do about the disgrace of what has happened to their position outside of the park. Please make a great difference by providing an "Ironclad" deal within the park boundaries for the NY 136th.

Very truly yours,

Elizabeth S. Kaszubski

Descendants of the 136th New York

## RESPONSES

Author: (Elizabeth S. Kaszubski) at NP--INTERNET
Date: 10/6/98 10:45 PM
Priority: Normal
CC: GETT Superintendent at NP-GETT
TO: editor@usatoday.com at NP--INTERNET
CC: phylliss_dubois@frontiercorp com at NP--INTERNET
CC: rafur@juno.com at NP--INTERNET
CC: benedict@buffnet.net at NP--INTERNET
CC: chrisandsue@juno.com at NP--INTERNET
CC: jaleavoy@acsu.buffalo.edu at NP--INTERNET
Subject: Ms. Eckert at Gettysburg needs to remember those who died on
---------- Message Contents --

Dear Editor,

The article in your Oct. 5 edition concerning Ms. Rosensteel Eckert's actions to take back the "family collection" at Gettysburg National Park really struck a nerve. My great great grandfather watched in horror as his brother, Arzy West, was killed defending the very position of that battle line that her family decided to build their museum / house on in 1920. Lafayette West survived the war and died in 1919. He certainly wasn't one of those veterans she claimed made her family home "historical" by merely visiting there. The 17 men who died on that line might think her words quite unpatriotic. Wouldn't one think that the sacred battle line of the 136th New York Infantry Volunteers, underlying the house, would be more historical than the house that never should have been built there? Her uncle gathered relics on the battlefield, but weren't many of these items actually government issued-property, and yet, she wants them all back? It is obvious that she is unwilling to part with the old building that her family sold to the government in 1971. The government is correcting a great wrong by finally tearing that building down and restoring the historic battle line. If Ms. Eckert respects the real sacrifices made at Gettysburg, she should know in her heart that only she can end this latest battle and finally do the right thing for this regiment. Her family owes this one to "these honored dead".

Elizabeth Stead Kaszubski
Founder, Descendants of the 136 NY

## Descendants of the NY 136th Infantry Regiment

## Descendants of the NY 136th Infantry Regiment

**Descendants of the NY 136th Infantry Regiment**

October 12, 1998

Dr John A Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr Latschar,

As founder of the Descendants of the 136th New York Infantry Volunteers, I herewith render our group's views concerning the *Draft* General Management Plan and Environmental Impact Statement for GNMP. We did send you some questions (in a yet unanswered electronic mail) on Monday, September 28, 1998. Although these answers were not in our hands as of today, we know you are quite busy and felt it best that we get this letter in before the October 17, 1998 deadline for public comment Members of our group were also encouraged to write to you individually if they felt the need.

After polling our members, we have found that they are decidedly FOR the National Park Service plan that would include the restoration of the battle line and position of the New York 136th Infantry. We feel it is significantly overdue. As you are probably aware, this unit's battle and skirmish lines included areas outside the Park Service's control that have been totally developed. Fortunately, the area of their line inside the park boundary, in the vicinity of the current National Park Visitor Center, is within the government's control

**We feel strongly that erection of the new Visitor Center must have the removal of the current Visitor Center, and all of its associated roads and parking lots, as part of an irrevocable package deal. This location must be restored to its historical appearance of 1863! Our ancestors defended this very line, some with their lives!**

Enclosed is a photo of a soldier who horribly watched his brother die defending this line. This is truly hallowed ground. Let us not forget the honored dead who made the ultimate sacrifice here. If any person or business tries to cut a deal not to restore any part of our ancestor's position or to preserve the current Visitor Center, please keep these veterans in mind and tell them there is no way the Park Service is going to compromise this ground.

Very truly yours,

Elizabeth S. Kaszubski

Elizabeth S. Kaszubski
Founder, Descendants of the 136 New York

*Enclosure: Photo of my gg grandfather, Lafayette West- New York 136th, Company H*

## COMMENTS

Lafayette West
Dec. 7, 1837 - June 30, 1917

Civil War - 1st 139th Regt
Sept. 1862 - June 1865

Great Great Grandfather

Mrs. Elizabeth Lazzaro
143 Nobel Dr.
N. Tonawanda, New York 14120

at his brother Aggie's
cider when he was killed
at Petersburg

## RESPONSES

## Descendants of the NY 136th Infantry Regiment

Descendants of the NY 136th Infantry Regiment

November 1, 1998

Ms. Marie Rust
National Park Service Northeast Regional Director
U.S. Custom House
200 Chestnut Street
Philadelphia, PA 19106

Dear Ms. Rust,

We respectfully ask for equal time! We represent the brave soldiers who defended the very location of the current Visitor Center at Gettysburg National Military Park. We know our antagonist, Ms. Angela Rosenstiel Eckert, had a personal audience with you recently. We would implore you to take a moment to learn about the other side of the issue. For additional information, we have enclosed the public comment we submitted to the park superintendent concerning our position.

Please do not compromise the battle line of the 136th New York to any business in Gettysburg, or to any person, such as Ms. Eckert! There is so dear little remaining of it that has not been developed into fast food restaurants, hotels, or the Coll Park housing subdivision. Enough is enough! We support the total restoration of everything defended by our regiment within the park boundaries to its 1863 historical appearance. It is sorely overdue to the memory of these veterans.

The current Visitor Center should have been razed by the Park Service the moment it was purchased in 1971. The NY 136th Infantry had 17 men killed defending that position. The decision not to tear down the Rosenstiel house/museum in the first place, caused the rest of our ancestors' battle position to be destroyed by developers wanting to be near the Visitor Center. The Rosenstiel family was the first of a long line of desecrators to ruin this hallowed ground for profit.

Ms. Eckert claims the Visitor Center, built in 1920, is historical because of the many veterans whom visited it. Isn't the 1863 battle line underlying it more historical? My ancestor, Lafayette West, could not find a shovel during the battle and had to leave his poor brother, Arzy West, (who was killed defending this battle line) wrapped in a blanket on top of the ground. Did her uncle, who picked things off the battle field in 1863, take items related to this regiment? It was the collection of 38,000 items, not the building, that the veterans visited to catch a glimpse of some long missing treasure, i.e., a bible or a diary.

My great great grandfather enlisted as a 24 year old farm boy and died in 1919, at over 80 years of age. We are certain that the veterans would not have approved of what the Rosenstiel family did to their battle line. The Park Service and this country owes a debt to these honored dead! Tear down the current Visitor Center and finally restore the battle line of the New York 136th Infantry regiment!

Very truly yours,

Elizabeth Steed Kaszubski

Elizabeth Steed Kaszubski
Founder, Descendants of the NY 136th Infantry

cc: Robert Stanton, NPS Director ✓
* Dr. John Latschar, Superintendent-GNMP ✓✓

Picture the ending scene in the movie, *Gettysburg*. As the finale plays, the two Chamberlain brothers hug each other, as they both survived the battle. Now picture Lafayette West carving his brother's name on a wood board so that he would not be counted among the unknown dead at Gettysburg. Arzy West died, at his brother's side, defending the position of the current National Park Service Gettysburg Visitor Center. Arzy is buried in the National Cemetery. Across the street, their battle line has been developed. It is time the National Park Service remove the Visitor Center from the hallowed ground Arzy died defending

The world did note and remember what Lincoln said here at Gettysburg, unfortunately, the country forgot "what they did here". It is time the Park Service does justice to their memory.

Lafayette West, NY 136th, Company H

## COMMENTS

### Evergreen Cemetery

799 BALTIMORE STREET
GETTYSBURG, PA 17325
717-334-4121

September 21, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar:

a It is our understanding that a part of your proposed changes in the National Cemetery is to remove the present Lafayette fence which divides the National Cemetery and the Evergreen Cemetery, and to replace it with a pipe fence.

We are opposed to the removal of this present fence for a number of historic, esthetic and practical reasons. They are listed as follows:

1. "The Ever Green Cemetery minutes of August 14th, 1861 state that the Board of Managers met - all present - The President in the chair."

"On motion, it was unanimously resolved whereas the report of the committee on the subject of the purchase of additional grounds, that the adjoining lands of Mepers, Menchey, Benner and Weinrich had been purchased by the President and so secured, that they could be had at the original cost price by the Cemetery Association was accepted by the Board, and whereas a proposition has been invited by David Wills, esq. as Agent for the Governor of Pennsylvania for the sale of these land to the state of Pennsylvania for the burial of the dead who fell in the Battle of Gettysburg.

Resolved, that the Board concur that D. McConaughy make the proposition, and upon its acceptance, convey these lands in'fee simple. at the cost prices, to the State of Pennsylvania, for the purpose of the burial of the said dead, with the condition that, enclosing the said lands, an open railing enclosure of ordinary height be made and maintained by the state or states interested, upon the division lines between said lands and the grounds of the Ever Green Cemetery.

On motion, the board adjourned."

George Arnold

Sec'ty

2. The stipulations involved in conveying the land to the State of Pennsylvania were made and accepted by the state, and these same stipulations also should be binding on the National Park Service since they assumed control of the land.

## RESPONSES

### Evergreen Cemetery

a It was not the intent of Alternative C, the proposed plan, to restore the historic pipe-rail boundary fence between the two cemeteries, although this action was included in Alternative D, the maximum restoration alternative. Alternative C, the proposed plan, has been modified to remove any references to restoration of this pipe-rail fence.

Page 2.

3. The historic Lafayette fence was transferred from Lafayette Square in Washington, D.C. to the Gettysburg National Cemetery in 1933. It gives a stately appearance to the National Cemetery and complements the magnificent entrance gate into the cemetery.

4. It also corresponds well with the design of the new fence recently erected around the improved Cemetery Annex.

5. It is our opinion that the proposed pipe fence would not serve to keep large numbers of curious visitors from crossing over onto our cemetery, possibly causing damage to its grounds, monuments and statuary.

b 6. It also has been stated that you intend to plant a hedge to serve as an additional barrier to prevent possible intrusion onto our property. This proposed hedge would involve greater continuous manpower expense to keep it trimmed, and it is our belief that no hedge will ever keep persons from passing through it.

7. If you persist in your proposed plan to remove the Lafayette fence, we will have no recourse but to erect a similar style fence on our side of the boundary line to assure the continuance of the present amount of protection. This would appear to cause a needless and ludicrous expenditure of both your funds and ours.

It is for the above reasons that we would hope to establish a dialogue with you to resolve this potentially controversial issue..

Yours truly.

William E. Hutchison, President
Evergreen Cemetery Board

cc: Mr. Bruce Babbitt, Sec. U.S. Dept. of the Interior
Representative William Goodling
Senator Rick Santorum
Senator Arlen Specter

b Planting the hedging along the common boundary between the Evergreen and Soldiers' National Cemeteries would restore the uniformity of design sought by William Saunders. As mentioned above, the park does not anticipate erecting the pipe-rail fence between two cemeteries. It would retain the existing iron fence under the prescriptions for Alternative C. However, it does intend to remove the nonhistoric and various types of vegetation which currently are planted along the fenceline. This vegetation would be replaced with a common hedging that would grow along the entirety of the boundary, immediately adjacent to the current Lafayette Square iron fencing. This hedging would be maintained at that "ordinary height" stipulated in the 1864 agreement between the Commonwealth and the Evergreen Cemetery board of directors. Its uniformity in structure and height would fulfill Saunders' original intent to have the hedging mimic the stone wall that enclosed all but the main-street frontage of the cemetery.

## COMMENTS

**Friends of the National Parks at Gettysburg, Inc.**

304B York Street, P.O. Box 4622, Gettysburg, PA 17325
Telephone: 717-334-0772 Fax: 717-334-3118

October 14, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

The Board of Directors of the Friends of the National Parks at Gettysburg (FNPG) presents these comments on Alternative C of the Draft General Management Plan (GMP) for the Gettysburg National Military Park (GNMP). In general, FNPG supports Alternative C and is pleased that the Park is seeking to restore reasonable areas of the 1863 landscape. Further, we believe that both Alternative A and D are not reasonable options for the long term mission of the Park, and that Alternative B does not address all significant issues important to park restoration. However, we do believe there are important changes that need to be considered for the General Management Plan.

The Gettysburg National Military Park's mission is to preserve and protect resources and also to provide understanding of the events that happened here. We believe that the interpretive themes are excellent in scope as well as long overdue. We are pleased to see the Park dealing with issues of causation, primarily slavery, and the consequences of the war. As we all know, the Battle of Gettysburg was not an isolated event; social and economic issues, as well as military, are important in our understanding.

We are also pleased to see inclusion of the experience of the residents of Gettysburg during the Battle. Just as the Battle was not an isolated event, it was also not simply a military event. To fully understand the impact of the Battle, one must also understand the impact on noncombatants.

FNPG has previously stated its approval of the direction being taken by those involved in creating a new Visitor Center/Museum facility. We are pleased to see that many of our members' concerns have been addressed as the plans have moved forward. We strongly support a new facility and believe that it is essential to full understanding of the battle. Modern facilities allowing the visitor greater access to information, an enhanced museum experience, and greater interactive opportunities will foster both understanding and greater visitation.

a While we agree with the restoration of the 1863 landscape, we urge caution and balance in dealing with environmental and historical resources. We recommend that detailed plans of phasing be done for changes to the landscape. The restoration of the historic landscape must be

## RESPONSES

### Friends of the National Parks at Gettysburg, Inc.

a The GMP is a long-term planning document that will guide the park for the next 10-20 years. Following final approval of the GMP, where they are needed implementation plans would be written for specific actions, such as the removal of non-historic vegetation. These implementation plans would include identifying best management practices to address such questions as how to remove the vegetation in the most environmentally sensitive manner, when to do the removal so as to minimize the impacts to wildlife, soil, and water quality, to establish a timetable for the removal, and how to maintain those areas once they have been cleared. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas.

b NPS actively manages for air quality in its parks. Some of the tour busses operating in the park already use alternative sources of fuel. Where it is feasible, any new service would also be designed to lessen sources of air pollution.

environmentally sustainable and absolutely must be maintained as a guiding principle of the Park. Further, we recommend that shuttles and buses used by the Park or in partnership with the Park or Visitor Center facility be actively encouraged to use fuels that can lessen potential damage to the environment. Such action will aid in reducing impacts on the environment in surrounding areas as well as within the boundaries of the Park. We further urge that any shuttle system remain reasonably priced to accommodate visitation by families.

b

c

The issue of traffic is fraught with challenges for both the Park and the surrounding area. The Friends believe that a new traffic study and implementation design needs to be conducted. While we can appreciate the need for traffic management within the Park we don't believe that this section of the plan is able to be successful without plans from surrounding municipalities. Since we are unclear about the plans of the surrounding jurisdictions, we believe that the Park's plans are dependent on decisions outside of GNMP control. While the Park can be contributory to area and regional designs, it must concentrate on areas over which it has control.

d

Finally, the proposed restoration of pipe fencing around 13 miles of the commemorative area introduces increased risks of accidents, especially for children, and is a possible deterrent to the visitor's line of sight. A pipe fence is esthetically unpleasant and serves only as an unnecessary intrusion. When the veterans installed pipe fencing, visitation was very different both in numbers and visitor expectation. People observed the battle areas from this fence, whereas today's visitor wants and deserves a far more personal contact with the ground, monuments and markers. We urge a reexamination of pipe fencing and recommend that it be deleted as part of Alternative C

e

The amount of work that goes into this type of plan and document can only be described as monumental. It is time that this Park operated under a strong direction, with clear goals and expectations. On behalf of FNPG's 18,000 members and donors, I commend the staff for its diligent effort to that end.

In summary, we believe that the goals, missions and proscriptions are well designed. It would be our hope that the issue of traffic as it affects the Park and the surrounding area can be reexamined. Additionally we believe that the resource driven nature of the plan must be maintained as a basis for all future General Management Plans.

Thank you for your consideration of our comments and recommendations. FNPG will continue to monitor and contribute to the process as it moves forward.

Sincerely,

Earl J. Coates
President

c If fees are determined to be necessary in order to operate the proposed shuttle system, they would be reasonably priced in accordance with NPS guidelines.

d NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

e The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new, modern design element into the Battlefield Commemorative Resource Area of the park.

The reintroduction of pipe-rail fencing along some of the park's avenues should not deter visitor views. Although opinions vary about the aesthetics of various aspects of the both the commemorative design and the vernacular battlefield landscape, the pipe-rail fencing was nonetheless part of the original design effort that transformed portions of the battlefield into formal park environs. The fencing enclosed and set off the formal lawn, monuments, cannon, and avenues and was one of those "artistic and patriotic effects" envisioned by General Daniel Sickles in 1894. As one of the features that was to give "added glory and significance" to the Gettysburg battlefield, the pipe-rail fencing was an integral and early part of the park's design effort. Although today's visitors often demand immediate access to all parts of the battlefield, NPS considers that the reintroduction of avenue fencing will not unnecessarily impede respectful use of and access to the battlefield.

## Gettysburg Area Retail Merchant Association

P.O. Box 4914
Gettysburg, Pa. 17325

October 14, 1998

Dr John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Rd
Gettysburg, Pa. 17325

Dear Dr Latschar,

Enclosed is the position of the Gettysburg Area Retail Merchant Association regarding the draft General Management Plan and Environmental Impact Statement for the Gettysburg National Military Park. These comments were unanimously accepted at our General Membership Meeting of October 14, 1998

Sincerely,

Joyce A. Jackson, President

Dawn Williams Heflin, Vice President

Crosby Hartzell, Treasurer

Polly Parone, Secretary

Richard Codori, Board member

Holliday Giles, Board member

Pauline Peterson, Board member

Susan Trostle, Board member

Robert Weiland, Board member

encl

## Gettysburg Area Retail Merchants Association

**a** NPS does not consider that this project will contribute to urban sprawl. The facilities replace those already in existence, and relocates them not far from their current location.

NPS has proposed significant measures in the draft GMP (pages 76, 91-2) to partner with local communities, particularly the Borough of Gettysburg. These initiatives are intended to improve the interpretation of the town of Gettysburg, its citizens and their role and the battle and its aftermath, and to improve visitor services. NPS has entered into a Letter of Intent with the Borough of Gettysburg to accomplish these initiatives. Proposals include:

- Expand the historic pathway and related media and programs [in downtown Gettysburg]
- Cooperate with local entities to preserve, rehabilitate and interpret the Lincoln Train Station [in downtown Gettysburg]
- Establish a partnership with local governments, the Commonwealth of Pennsylvania and private groups to acquire, preserve, interpret and operate the Wills House
- Establish a NPS presence in downtown Gettysburg
- Develop, in coordination with local entities, an active menu of programs, interpretation, living history and tours to educate visitors about Gettysburg's role in the battle, its aftermath and the preservation of the battlefield.
- Provide information in the museum complex about the town of Gettysburg, the historic pathway, and other sites in the park Visitor Center, along with information about local and regional visitor services (hotels, restaurant, etc.)
- Work with the community and private entities to provide regular shuttle service between the museum complex and downtown Gettysburg.
- Incorporate the community in the park's auto tour.

These activities, combined with actions to limit additional development on Baltimore Pike, should not encourage additional sprawl.

**b** The Economic Impact Evaluation, prepared by the Office of Thomas J. Martin, was released to the public on August 17, 1998, at the same time the draft GMP/EIS was releasead. Copies of the report were distributed to interested individuals during a detailed presentation on the findings of the

**Response to the Proposed GMP**
**of the**
**Gettysburg National Military Park**
**by the**
**Gettysburg Area Retail Merchant Association**

**Accepted by membership**
**October 14, 1998**

**GARMA**
**P.O. BOX 4914**
**Getyysburg, Pa. 17325**

report at a public workshop on September 10, 1998. Copies were provided upon request to any interested individual throughout the comment period and are still available from the park.

c The economic assessment completed for the draft GMP/EIS suggested that visitation would decrease in the next ten years if no actions to improve the visitor experience were taken by NPS. This was because of a number of factors, described on page 230 of the draft GMP/EIS. These include the increasing domination of the travel and leisure industry by major destinations, investments in other attractions and visitor infrastructure in the region and throughout the U.S., lack of marketing by NPS, and other factors. The analysis suggests that the increases in visitation seen at Gettysburg NMP in the last decade may have been driven by media exposure from films and television series, and by general market growth, factors that are expected to dissipate. In any event, the purpose of the GMP is to protect resources and provide for visitor enjoyment and decreases or increases in levels of visitation are not motivating factors for developing the GMP alternatives.

The report you cite indicates that under Alternative A, visitation would decline. Under the action alternatives visitation would be expected to increase slightly.

d NPS is sympathetic to the concerns of GARMA regarding sprawl, and the action alternatives proposed in the draft incorporate many activities to limit its impact upon the park.

The draft GMP/EIS acknowledged that relocation of the park visitor facilities might change visitor spending patterns and create indirect effects on area development (pg. 246). To help protect its retail base and enhance preservation of its historic downtown, the Borough of Gettysburg asked NPS to include several actions to ensure the continued health of its downtown historic district. These include: NPS partnership in the development of the Wills House; an NPS ranger presence downtown; strengthening the historic pathways project; expansion of NPS' auto tour to include downtown Gettysburg; inclusion of a downtown/park shuttle; continued promotion of local visitor services by the VCB in the park museum complex; and routing of the auto tour along Steinwehr Avenue.

## COMMENTS

The Gettysburg Area Retail Merchant Association (GARMA) is a fifty year old organization comprised of approximately 70 businesses in the Gettysburg area. We have studied the Report of the Pennsylvania 21st Century Environment Commission with their recommendations to Governor Ridge. The first item is dealing with the negative effects of urban sprawl in our state. GARMA has made its position against sprawl well known. We brought in a speaker from the National Trust For Historic Preservation to educate our citizens on this issue.

a The National Park Service's proposed GMP perpetuates urban sprawl. It creates new infrastructure with no regard for existing services. It takes business from the downtown, thus eroding the tax base of the Borough. It shifts dollars from existing businesses and sends the profits directly out of the area. Sprawl has the potential to devastate the Borough of Gettysburg.

b We particularly take issue with the Economic Impact Evaluation prepared by the Office of Thomas J. Martin, Economic Research and Management Consultants. It is an important foundational piece for the proposed GMP. This report is purposely not included in the GMP, and contains many errors, contradictions and wrong assumptions.

c On page IV-5 of the report, it states *"The attendance estimates for Gettysburg National Military Park are based on the premise that the overall visitation level to GNMP will not be transformed from its current levels by the implementation of the plan alternatives and/or the creation of a larger and relocated Visitor Center."* Later on the same page it says *" With no improvements, the increases in attendance in recent years due to media exposure and general market growth are expected to dissipate."* They do not explain how they have come to that conclusion. Further in the report, on page VI-3, they state *"The analysis of future visitors indicates that the number of visitors will increase under Alternatives B,C and D."* This contradicts earlier claims of no rise in visitation. The second half of the report hinges upon an increase in visitation, and assumes increased spending. By examining the enclosed bar graph, which plots the NPS published figures on visitation, one sees an overall increase in visitation since 1980. There is no indication that tourism will decline in the future. New businesses and money to the town have spurred improvements and renovations and each helps to enhance our visitor's experience. This report contradicts itself on its expectations of visitation.

d Typical of sprawl is a redistribution of spending from the heart of an urban area to the outlying areas. This has contributed to the decline of American towns and cities ,the virtual death of downtowns. It is very clearly stated in the proposed GMP on page VI-3. *"Changes (will occur) in the location of some of the visitor spending in Gettysburg due to the creation of additional spending opportunities at the new Visitors Center."* Page V-4 makes a statement to which we agree *"..there are limits to visitors retail budgets"*. As with any case of urban sprawl, the dollars increase only slightly, yet shift dramatically from the established tax base, to the outlying business. in this case, the Federally owned Gettysburg National Military Park.

e We are against commercialization of the park. For years, the park has been on a path to remove commercialization. With this GMP the direction is changed, now proposing major commercial ventures within their own boundaries. We feel that the issue of public/private partnership should be reconsidered by Congress as it is setting a precedence for all national parks.

The members of the Gettysburg Area Retail Merchant Association are trying to be good citizens and review the proposed GMP. We are trying to educate ourselves. We are trying to look out for our livelihoods. And, we are trying to conduct business as usual. Owning your own business does not consist of punching a clock and forgetting it. Countless hours are invested when the business is closed or you are not physically on the premises.

## RESPONSES

NPS and the Borough of Gettysburg have signed a Letter of Intent to begin development of interpretive planning for these activities, and which are included in the draft GMP/EIS. NPS believes that these actions will strengthen the historic district, enhance pedestrian use of the area and improve the visitor experience, keeping businesses in the downtown.

NPS considers that it would be in the best interests of park visitors to limit additional roadside development on the Baltimore and Taneytown Pike gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 *Land Protection Plan* (LPP). The draft GMP/EIS discussed NPS' intention to work with partners and Cumberland Township to protect Baltimore Pike (pg.246). Pages 100 – 105 of the draft GMP/EIS discuss other mechanisms to protect these corridors, and other park view corridors, from inappropriate development. NPS will work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to find ways to protect these areas.

e The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

The GMP is very important to the future of Gettysburg and it's economy. We do not take the task lightly. The National Park Service has placed an unusual burden upon us by expecting us to respond to the proposed GMP in a 60 day period. The task is enormous. The plan itself is 329 pages of very small print and requires at least 12 hours of reading. Supporting material such as the Economic Impact report require more hours of reading. The NPS offered us workshops....over 12 hours of workshops in one week alone. How were we to fit that into our schedules? Then, hours of public meetings. We are not superhuman. It is unreasonable to expect us to digest this is a mere 60 days.

We have asked all along for the review period to be extended. The GMP took months and months for a team of full time paid professionals to write. We are asked to review it in 60 short days, during a still busy time of year.

At this point, we have many questions unanswered. One of our main concerns is the economic impact on the local economy. The Martin Report, which is not included in the plan but is the basis for assumptions, is seriously flawed. The GMP, which stands to effect Gettysburg's entire future, should not be taken lightly. All players and ramifications should be considered. If the project is done right, it could be a wonderful benefit to the entire community and as business people, we would certainly welcome it. The planning process should not be rushed. We again appeal for an extension to the review process for the good of all parties. If the review period cannot be extended, we must go on record as not endorsing the proposed GMP

## RESPONSES

RESPONSES

COMMENTS

**Gettysburg Battlefield Preservation Association**
**P.O. Box 1863**
**Gettysburg, Pennsylvania 17325**
16 October 1998

Dr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa. 17325

Dear Dr. Latschar:

I am submitting this letter on behalf of our Board to express our official position on the **Draft General Management Plan/Environmental Impact Statement**. In summary, we have no choice but to advocate Alternative A, no action, because this document completely fails to provide us or the public with an opportunity to comment on other reasonable alternatives to Alternative C "the preferred plan," which assumes that the Visitor Center will be constructed by a private developer on the LeVan property. For this reason we contend that under the provisions of the National Environmental Policy Act (NEPA), this document is invalid as an Environmental Impact Statement, and as a useful planning tool, and must be substantially revised or completely rewritten to meet the intent of the law. a

While we accept that GNMP needs to improve its facilities, and has many pressing interpretive and resource management issues that deserve to be addressed, all of these needs are hidden by the prominence given to the Visitor Center issue, and the extraordinary efforts undertaken by the NPS and its consultants to justify Alternative C. The document is anything but a "Gettysburg Address" in clarity or purpose.

In watching public reaction over the past year, it has become increasingly evident that comments from concerned citizens are leading the greater Gettysburg community towards a consensus position. That position accepts the need for improved facilities, and supports many of the goals outlined in the GMP, but rejects the notion of commercialism (or a monopoly) inside the Park, and affirms the need to consider alternatives to the current proposal in an effort to strike a reasonable compromise among all the Park's friends, neighbors, and supporters. It is inexcusable that in seeking information to make better decisions, the public has been subjected to withholding of information and often been compelled to file Freedom of Information Act requests. This has only instilled great mistrust in an Agency that desperately needs public encouragement and support in order to survive.

## Gettysburg Battlefield Preservation Association

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new GMP/EIS to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the draft GMP/EIS (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

| COMMENTS | RESPONSES |
| --- | --- |
| We urge you to give up your pride of authorship of this proposal and demonstrate courageous leadership by dropping the plan. There is an extraordinary level of citizen and government interest now that provides an unparalleled opportunity to turn anger and mistrust into a true partnership "of the people, by the people, for the people" so that the Gettysburg Battlefield, precious to us all, "shall not perish from the earth."<br><br>Sincerely,<br>Walter L. Powell, Ph.D.<br>President | |

## Gettysburg Equestrian Historical Society

September 17, 1998

Superintendent John Latschar
Gettysburg National Military Park
Gettysburg, Pa 17325

Dear Superintendent Latschar:

We would like to take this opportunity to thank you and your staff for the past years well organized and important discussions on the proposed new GMP for the Park.

The Gettysburg Equestrian Historical Society considers as its main role to assist the Park in the maintenance and continuing use of the horse trails.

We request that our Society please be included in all discussions regarding said trails including trail change and consideration of historical vs. recreational trails.

Most important is our belief that those who use the Park facilities must be prepared to give something back. The, something, in our case is the man and woman power of our society for maintenance work, as well as, building projects such as the two new bridges. The other resource that we offer is financial, with all the funds raised through horse shows and guided trail rides, offered to the Park for trail construction and maintenance projects.

In short, we are pleased with the direction of the discussion of the GMP, up to this time, and want very much to continue our fine relationship as friends of the Gettysburg National Military Park with regard to historical horseback riding.

We stand ready to assist and contribute to the well being of the Park as required.

Sincerely:

Richard Book

Richard Book/President of the G.E.I

RB/rah

## Gettysburg Equestrian Historical Society

## COMMENTS

Gettysburg-Adams County Area Chamber of Commerce

October 2, 1998

To: Dr. John Latschar

From: Gettysburg-Adams County Area Chamber of Commerce Board of Directors

Re: Visitor Center Project Statement

It is the Gettysburg-Adams County Area Chamber of Commerce Board of Directors' opinion that the proposed visitor center is a project that must be implemented to enhance the visitors' experience. As to its final location, we choose not to express an opinion.

a Additionally, representatives of the Board feel that key issues, such as zoning, infrastructure and financial accountability have not been fully addressed. It is the position of the Board that the

b project remain taxable to our local municipalities. The developer should be responsible, as any

a (cont.) developer and private citizen in Adams County would be, to adhere to all zoning regulations, to adhere to all planning regulations, and to guarantee that additional infrastructure, i.e. sewer/water and roadways be upgraded so that after the project is completed there is substantial availability of these infrastructure resources for the residing citizens of Adams County.

33 York Street • Gettysburg, Pennsylvania 17325 • (717) 334-8151
*"Rich in History - Abundant In Opportunity"*

## RESPONSES

### Gettysburg - Adams County Area Chamber of Commerce

**a** Since the proposed development of the visitor center/museum complex would be accomplished by a private, not-for-profit corporation, upon privately-owned lands within the boundary of the national park, the development would be subject to all applicable local and state planning and zoning requirements. The Gettysburg National Battlefield Museum Foundation would be responsible for complying with all applicable regulations.

**b** The Gettysburg National Battlefield Museum Foundation would pay all appropriate state and local taxes.

## Michigan Regimental Roundtable

Michigan Regimental Roundtable

United States Department of Interior
Gettysburg National Military Park
Getttysburg, PA 17325

Dear Sir:

As a concerned citizen and a member of the Michigan Regimental Roundtable I would like to express my sincere thanks to the GNMP staff for providing answers and information on the General Management plan for GNMP.

After carefull study and evaluation of the facts our organization supports this plan. We beleive it is in the public interest and will enhance the park for future generations.

Sinecerely,

Joseph A. Epstein

## COMMENTS

**NATIONAL CAPITAL ASTRONOMERS, INC.**
WASHINGTON, D.C.
*Astronomy Affiliate of the Washington Academy of Sciences*

1998 October 15

John Latschar (Superintendent)
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Subject: Dark-Sky Restoration/Protection And Light Pollution Abatement/Avoidance

John:

a It is critical that the National Park Service (NPS) integrate dark-sky restoration/protection and light pollution abatement/avoidance into whatever *Draft General Management Plan and Environmental Impact Statement* (*GMP*) it adapts for Gettysburg National Military Park. In short, **the sky IS part of the Park**, the night sky in particular, and deserves inclusion in the *GMP* as a vital Park resource to be restored, protected, and managed.

The star-filled night sky was an intimate component of the American Civil War experience. The opposing sides' very flags reflect this close connection. Sadly, this aspect of our Civil War heritage is being degraded by light pollution: wasteful artificial brightening of the otherwise dark night sky from inefficient, inconsiderate, or ill-designed outdoor lighting.

The night "skyscape" forms a critical element of the Park's (and all national parks') natural and cultural resources. At Gettysburg, it is as equally deserving of NPS stewardship as landscapes, monuments, and artifacts. However, unlike other restoration/protection efforts, dark-sky restoration/protection involves saving money, not spending it. The NPS, by following the quality lighting guidelines promoted by the International Dark-Sky Association (IDA), which works closely with the Illuminating Engineering Society of North America (IES), can establish outside lighting policies, practices, and procedures in its *GMP* that foster light pollution abatement/avoidance, protect resources, enhance visitors' experiences, save taxpayers money, and expand partnerships with the Borough of Gettysburg and other entities, without detracting from safety, security, or utility.

Sincerely,

Daniel J. Costanzo

**DANIEL J. COSTANZO,** ***Past President, National Capital Astronomers, Inc.***

**P.S.** Please direct all correspondence concerning my comments to my home address:

Daniel J. Costanzo (National Capital Astronomers, Inc.)
900 N. Jacksonville Street
Arlington, VA 22205-1326 (Phone: 703/841-4765)

***NCA * c/o Jeffrey B. Norman * Suite #717 * The Garfield Building***
***5410 Connecticut Ave., N.W. * Washington, D.C. 20015-2837***

## RESPONSES

### National Capital Astronomers, Inc.

a NPS Management Guidelines recognize the part that darkness and the night sky play in the overall visitor experience and directs the NPS to cooperate with park neighbors and local government agencies to seek to minimize the intrusion of artificial light into the night scene (NPS Management Policies 4:18-19). However, since the park is closed during most of the hours of darkness, this issue was eliminated from further evaluation.

The park is currently closed to the public from 10:00 p.m. to 6:00 a.m. and no activities are permitted on the park during these hours. Consequently, the opportunity for visitors to experience the battlefield at night is limited. There are no lights on the battlefield except around private houses within the park boundary over which the NPS has no jurisdiction and historic houses where park residents live. The park's Visitor Center, Cyclorama Center, and maintenance complex have low-level lights, which are necessary for safety and security reasons. The Eternal Light Peace Memorial is lit at all times.

The NPS has worked in the past to reduce light on the battlefield. At major intersections with stoplights, the Pennsylvania Department of Transportation (PennDOT) usually requires streetlights. The NPS was able to persuade PennDOT not to put up streetlights at the intersection of Route 30 West and Reynolds Avenue in order to maintain the rural nature of the area. The designers of the Friend to Friend Masonic Memorial wanted the Memorial illuminated every night, but NPS persuaded them to light it only on special occasions. Consequently, the lights are on only three times a year.

The NPS would continue to work through its Land Protection Plan to acquire private property within the park boundary to remove non-historic structures, thus removing some sources of light from the battlefield. The NPS would also continue to work with its neighbors in the Historic District to minimize inappropriate development around the park.

National Parks
and Conservation Association

NORTHEAST REGIONAL OFFICE

16 October 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar,

The National Parks and Conservation Association is pleased to submit these comments in response to the draft general management plan (gmp) for Gettysburg National Military Park. NPCA is America's only private nonprofit citizen organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. An association of "Citizens Protecting America's Parks," NPCA was founded in 1919, and today has nearly 400,000 members.

NPCA strongly supports the proposed alternative (Alternative C) of the draft plan including the proposal to develop a new visitor center and museum facility through a public/private partnership. Alternative C, with some modifications, presents the most appropriate and comprehensive policy directive to fulfill the park's mission and goals. The proposed plan to rehabilitate the cultural landscape is bold, daring, and historically grounded. Together with the museum proposal, it offers the Park Service the best opportunity to provide visitors with an exceptional national park experience while preserving nationally significant resources. With responsible implementation the proposal has the ability to return Gettysburg to being the world-class national park that it deserves to be.

Alternative A is completely unacceptable as it would allow for the continued degradation of the nationally significant resources which are the heart and soul of the park. Alternative B does not go far enough to its efforts to return the battlefield to its historic conditions while the extensive nature of Alternative D, though laudable, is not necessary to achieve the park's mission and goals.

We will address our comments, concerns and conditions in the following manner: the planning process; land and resources; interpretation and visitor experience; visitor use and facilities; cooperative actions and partnerships; the museum proposal, and costs and implementation priorities.

**The Planning Process**

NPCA found the planning process to be exceptional. The availability of the staff to answer questions, the amount and detail of historical documentation that went into the development of the alternatives, the use of the historical documentation in the public meetings to bring the public into the process of framing those alternatives was unparalleled in my four years with NPCA. To some extent, the use of the documentation in the process allowed both the Park Service and the public to evaluate the environmental consequences of any proposed action as that proposal was being development. This is a standard that NPCA has strived

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## National Parks and Conservation Association

## COMMENTS

for over many years and in many general management planning processes. Gettysburg is exceptional in that the battlefield is so well documented historically; however, the staff did a remarkable job in assembling that documentation and integrating it into the public discussion. As a result, all of the alternatives are well grounded in sound and extensive analysis

In addition, I found the informal morning working group meetings to be very worthwhile, teaching me a great deal about the concerns of the local governments, the business community and the institutional community. I hope that the end of this planning process will not mean the end of these meetings as their continuation can be helpful to both the Park Service and the larger community, especially in reaching mutually beneficial goals.

The integration of the museum proposal into the general management planning process did disrupt the flow of the public discussion, but the overall result is a much stronger plan. While NPCA understood the need for NPS and the designated cooperator to negotiate the details of the proposal in an atmosphere of trust and confidentiality, we wished that NPS had been more forthcoming with the financial schematics for the plan (not actual dollars, but the concept for cash flow) as this would have done much to alleviate fears and answer questions about the legitimacy and soundness of the proposal.

**Land and Resources**

NPCA supports all of the management prescriptions that are common to all action alternatives with the following comments on specific proposed actions.

NPCA is highly supportive of returning selected small-scale features in the Major Battle Action Area of the battlefield to their historic conditions. At the heart of this proposed general management plan is the development of a new core visitor experience for which the cultural landscape is the foundation. Alternative C, though confined to the Major Battle Action Area, will allow visitors to understand the grand sweep of the battle's progression more fully, as well as understand the specific actions and tactics that are the core of the battle's story. We find that Alternative B does not go far enough in returning the battlefield to its historic conditions. While improving the readability of the battlefield greatly, it would not present the visitor with the nuances of the physical landscape that were so critical to the outcome of the battle. Alternative D is laudable in terms of rehabilitating the entire cultural landscape, but focusing the rehabilitation to the Major Battle Action Area (Alternative C) gains the highest interpretive, educational and inspirational value.

a NPCA understands that accomplishing the rehabilitation of the landscape under Alternative C is a long-term management objective. However, if this ambitious plan is to be realized, NPS must develop an implementation program in the very near future and include in it all fundamental studies and planning processes that will be required.

NPCA supports Alternative C for the Soldiers' National Monument.

With regard to the park's boundary, NPCA supports the actions proposed by the draft gmp. We are especially supportive of placing the Wills House in the park boundary, as it is key to the story of Lincoln at Gettysburg. We are concerned with the proposal to delete the rear portions of three lots on Round Top Lane. The draft gmp gave no supporting documentation for this proposal. Given the sensitivity of the land swap with Gettysburg College in the recent past, it is critical that NPS fully document the need for this proposed action.

b

NPCA understands, given the lack of sufficient congressional appropriations, that NPS must manage some of the park's historic properties in a way that generates income to defer the costs of maintenance. Such income generating activities must be for the sole purpose of preservation, and the activities themselves must be appropriate and affirmatively support the mission, purpose and goals of the park.

2

## RESPONSES

a As a part of its Government and Performance Act (GPRA) requirements, NPS requires the development of park-specific 5-year and annual workplans. After the final GMP/EIS is completed and NPS selects an alternative, a new 5-year GPRA plan will be developed for Gettysburg National Military Park. The 5-year plan will prioritize activities that may result from the management prescriptions, recommend those activities that should be included in the first 5-year plan, and then list all of the actions (including planning, studies, and environmental processes) that would be required to meet those prioritized actions.

b These three privately owned tracts are not needed for park purposes because no major battle action occurred on them and they are not visible from any interpretive points in the park (see Figure 11). These tracts, which total 2.2 acres, are all privately owned, and two are improved with single family residences. It should be noted that unlike the land deleted in the Gettysburg College exchange, the NPS does not currently own any interest in these properties.

**Interpretation and Visitor Experience**
NPCA is highly supportive of the proposed management prescriptions that are common to all actions and under Alternative C.

NPCA is highly supportive of the proposal to develop a new visitor center, museum and collections storage area. Gettysburg NMP is in desperate need of a new gateway facility to educate, enrich and enlighten visitors about the Gettysburg campaign. We believe the specific proposal presented here will provide the high quality experience that should be found at Gettysburg.

We especially applaud NPS for expanding the interpretive themes of the park to encompass not just the specifics of the battle, but to place the battle within the full context of the causes and consequences of the Civil War. This larger view will capture a broader audience and make the story of Gettysburg and the Civil War more relevant to us as individuals and as a nation. NPCA is especially supportive of the new life this plan gives to the Soldiers' National Cemetery. Most of all, we applaud the plan to highlight the theme of national unity that was the core of Lincoln's address. We as a nation have forgotten what was at the heart of that short speech, and the draft gmp's new interpretive framework will give it the attention that it greatly deserves.

NPCA is highly supportive of integrating the story of the town during and after the battle into the park's interpretive framework. Like the Gettysburg Address, it is an integral though often overlooked aspect of the story of the park. The proposed alternative reasserts this story to give it its proper prominence. Hopefully, implementation of this action will be a vehicle for building upon the working relationship between park and the Borough of Gettysburg.

**Visitor Use and Facilities**
NPCA supports the proposed management prescriptions common to all action alternatives and those specific to Alternative C. The heart of this section is how NPS will protect the park's nationally significant resources from the damaging impacts of human use and activity. NPCA is pleased with the framework for protection outlined by the proposed management prescriptions and range of actions in this draft general management plan, but we are concerned that the framework does not go far enough to guarantee protection of the resources. It is absolutely necessary that the National Park Service establish carrying capacities for the most overused and damaged sites in the park. NPCA will submit additional comments on this topic under separate cover. Needless to say, we are very willing to work with the National Park Service to develop carrying capacities that are meaningful and truly protective of both the resources and the visitor experience. c

Also essential is the establishment of a transportation management system. The National Park Service must not wait until the completion of the new visitor center before beginning to address this problem. The first priority for implementation of this plan is to develop a transportation management plan for the park with this initial plan serving as the foundation for a final plan that includes the new visitor center.

**Partnership and Cooperative Actions**
National parks are not islands. Rather, they are embedded in the physical landscape that surrounds them. This is truer for Gettysburg more than other cultural parks as the town is literally part of the battlefield and is an integral part of the story. The preferred alternative offers a way to extend telling the full story beyond the park's boundary in a manner that is beneficial to the park, the community and especially to the visitor.

Just as the park is not physically isolated, the National Park Service cannot carry out its operations in isolation. The park needs partners to help fulfill its mission and goals. The proposed alternative offers a sound vision for creating a framework for sharing stewardship of the park's resources with its partners. NPCA is especially pleased with the requirement in the museum proposal that there be a Licensed Battlefield Guide on all bus tours in the park.

3

c The National Park Service shares your concerns over high visitation impacts to resource protection and visitor experience here at Gettysburg. The planning team documented a number of concerns and current degradation to resources and visitor experience in developing the draft GMP/EIS. The draft GMP/EIS looked at a number of potential solutions to these concerns and addressed these in the action alternatives. These solutions include the implementation of a traffic management system, relocation of trails to historic lanes, implementation of alternative transportation systems and opening up new areas of the park to disperse visitor use. In addition to these items, the action alternatives propose that future implementation plans would establish carrying capacities for the most overused sites and would size parking lots, walkways and other facilities to enforce these limits. When an alternative is chosen by NPS, we look forward to working with individuals and interested groups in developing plans that would ensure long term protection of the resource and an improved visitor experience.

## COMMENTS

NPCA fully supports the management prescription for building partnerships to preserve the significant related sites outside the park boundary and to preserve the park's scenic and rural setting. What makes the battlefield so alive is its beautiful physical surroundings. NPCA urges the local governments to work with the Park Service to preserve one of the area's most precious assets. NPCA is willing to be part of the cooperative network of partners working to preserve the character of the area.

**The Museum Proposal**

As stated above, NPCA supports the proposal to develop a new visitor center and museum through a public/private partnership. In the early phases of public discussion on the proposal, NPCA set three standards that the proposal had to meet:

- It had to be necessary and appropriate;
- It had to affirmatively support the mission, purpose and goals of the park; and
- It had to be the minimum necessary to insure financial viability.

The proposal meets those standards. We believe the physical presence of the new facility will be an asset to both the park and the community, as well as to the National Park System. We believe the letter of intent provides the necessary safeguards for retaining NPS stewardship authority over the historic resources.

NPCA rigorously examined the economic impact evaluation for the museum proposal as prepared by the Office of Thomas J. Martin for the National Park Service. We found that the overall visitation analysis to be conservative, sound and reasonable, as is the visitor center (venue attendance) visitation analysis. Our review showed that the proposed venue attendance estimates appear reasonable, and that the prospective utilization and sales for the support facilities (bookstore and museum shop, and cafeteria) also appear reasonable. Cash flow estimates for the proposed facilities appear somewhat high, but seem mitigated with the assurances of a high quality product that will have broad appeal and conservative venue attendance estimates. NPS must structure the project so that it will be assured of the necessary cash flow.

d With regard to the project's financing, NPCA is pleased to see the reduction in the debt component; however, we urge NPS to look at ways to reduce the debt (and therefore, risk) even further.

e NPCA suggests relooking at the necessity of the movie theater. While acceptable—even desirable—as an interpretive tool, its costs represent nearly the whole of the private debt.

f NPCA also suggests looking at some forms of public financing, such as tax-increment financing for the land purchase or tax-exempt bonds to supplement the fundraising plan. In addition, if private financing is used, we suggest the establishment of a trust fund to buy out the loan in case of default. This would involve continuation of fundraising beyond capital needs to establish a capital reserve account.

We do have a number of concerns still remaining: the composition and selection of the Foundation's board; the content of the fundraising plan the selection of the designer and the design process for the facility; traffic and transportation planning (the draft gmp provided only preliminary analysis); and the preservation of Baltimore Pike. NPCA is very willing to work with NPS and the designated cooperator to assure that these concerns are addressed.

**Costs and Implementation Priorities**

g As was explained at the 10 September 1998 public workshop, Table 50: Projected Cost--Alternative C needs to be reorganized for clarification. In addition, it would be helpful to outline the sources for the NPS-funded items. It is our understanding from the verbal explanation given at the public workshop that the sources are part reallocation of ONPS, part congressional requests, part cyclic funds, and part donation. The final text should make explicit those funding sources.

h As stated above, one of the top priorities for implementation is the development of a transportation management plan. Likewise, the Park Service should begin to develop a more thorough traffic management plan for the museum as soon as possible so that mitigating measures can be adopted.

4

## RESPONSES

d NPS has identified three interpretive venues as necessary to meet its interpretive mission, including the theater. NPS' assessment indicates that it would be feasible to include the theater as a part of the proposed visitor center and museum. However, NPS does appreciate NPCA's comments, and if NPS selects one of the action alternatives for implementation, NPS would continue to consider ways to reduce the debt further while meeting its interpretive and collections storage goals.

e The NPS recognizes both the value, and the cost-benefit ratio, of the theater as currently proposed. The NPS would consider the consolidation of interpretive venues in the museum complex during the preliminary interpretive/exhibit design phase. The goal would be to achieve the highest possible interpretive benefits at the least feasible risk.

f The NPS and the Museum Foundation would consider these suggestions during the formulation of the fund-raising plans.

g Tables 49, 50 and 51 which show the Projected Cost of Alternatives B, C and D have been reformatted for clarity, as explained in the September 10, 1998 public workshop. The changes are included in the Final GMP/EIS.

h The Gettysburg National Battlefield Museum Foundation would prepare additional traffic studies if NPS decides to implement one of the action alternatives after the conclusion of appropriate environmental planning. At that time, additional mitigations to alleviate traffic concerns would be considered. In addition, the Comprehensive Road Improvement Study recommendations would be taken into account by NPS and the Foundation during future planning for the proposed facility.

NPCA wishes to congratulate the National Park Service for the fine work that went into developing this very complicated but thorough plan. The story of Gettysburg is a painful one, not only for the men who fought in the battle, but for the national as a whole. It embodies all the social, political, military and spiritual conflicts comprising the Civil War. As the site of Lincoln's address, it is also our greatest symbol for national unity. It deserves the highest degree of preservation that the National Park Service can afford. This plan goes a long way to achieving that goal.

If you have any questions regarding our comments, please call me at 617-354-8940.

Yours,

Eileen Woodford
Northeast Regional Director

5

## National Trust for Historic Preservation

National Trust for Historic Preservation
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(202) 588-6000 / FAX (202) 588-6038 · TTY (202) 588-6200

October 16, 1998

Dr. John A. Latscher, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Superintendent Latscher:

On behalf of the National Trust for Historic Preservation and our approximately 275,000 members, I am writing to provide comments on the *Draft General Management Plan and Environmental Impact Statement* ("GMP") for Gettysburg National Military Park. We commend the National Park Service for your work in preparing this excellent planning document, for the thorough, clear explanation of the four alternatives and the environmental consequences of those alternatives, and for providing extensive opportunities for public involvement throughout the planning process.

The National Trust strongly supports Alternative C, the proposed General Management Plan. Alternative A does not meet any of Gettysburg National Military Park's purposes and goals and would permit continued deterioration of the park's historic and natural resources and the visitor experience. It should not be adopted. Alternative B does not contain management prescriptions that adequately address the Major Battle Action Area, the Soldiers National Cemetery, the Battlefield Commemoration Area, and the visitor experience.

We specifically endorse Alternative C's management prescriptions for the Major Battle Action Area, the Soldiers National Cemetery, and the Battlefield Commemoration Area. Alternative C's management prescriptions for the Major Battle Action Area deserve specific strong endorsement for protection of natural and historic resources and for providing an interpretative experience that will lead the visitor to an understanding of the battle, the movement of the units of both armies, and the experiences of the individual soldiers. We also specifically endorse removal of the National Tower.

The National Trust also supports Alternative C's management prescriptions for interpretation and visitor experience, specifically the removal of the visitor center from its present location and the construction of a new visitor center, museum, and collections storage area. We commend the National Park Service for folding the visitor center complex proposal into the General Management Plan and the planning process, including

opportunities for public comment on the proposal submitted by Mr. Robert Kinsley. The National Trust's position on the visitor center, museum, collections storage facility complex has been that each component must affirmatively support the mission and purposes of the National Park System and Gettysburg Military National Park. In our view, the proposed complex, as provided for in Alternative C, meets that standard. The location of the complex significantly reduces the impact of the visitor center complex on historic and natural resources, and the new location should greatly improve transportation management. The construction of a new collections storage facility will address one of the most pressing problems at Gettysburg National Military Park. Finally, we continue to support the creation of a public-private partnership to plan, develop and operate the visitor center, museum, and related facilities. In our view the letter of intent and the General Management Plan provide the essential elements of oversight and control by the National Park Service to ensure that the complex affirmatively supports the mission and purposes of Gettysburg National Military Park.

Thank you for the opportunity to offer these comments.

Sincerely,

Richard Moe
President

ORGANIZATION OF AMERICAN HISTORIANS
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September 14, 1998

Dr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear John:

Enclosed are the site review reports for the OAH's August 18-19 visit to Gettysburg National Military Park. I am sending these to Dwight Pitcaithley under separate cover.

Professors Eric Foner, James McPherson, and Nina Silber each spoke highly of their visit you and your staff. Each also seems to have found the site review process a valuable experience. We hope the enclosed reports will be useful in the park's continuing development, as well as within the history program of the National Park Service.

Best regards,

John R. Dichtl
Assistant Executive Director, OAH

Enclosure

## Organization of American Historians

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**OAH Site Review Team for Gettysburg National Military Park**
**August 18-19, 1998**

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President, Organization of American Historians, 1993-94
New York Council for the Humanities Scholar of the Year, 1995

Selected Publications
- *Reconstruction: America's Unfinished Revolution, 1863-1877* (New York: Harper & Row, 1988) —Bancroft Prize and the Los Angeles Times Book Award
- *The Reader's Companion to American History* (Boston: Houghton-Mifflin, 1991), edited with John Garraty
- *Freedom's lawmakers: a directory of Black officeholders during Reconstruction* (Baton Rouge: Louisiana State University Press, 1996)
- *The New American History* (Philadelphia: Temple University Press, 1990)

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Selected Publications
- *Battle Cry of Freedom: The Civil War Era* (New York: Oxford University Press, 1988) —Pulitzer Prize in History for 1989
- *For Cause and Comrades: Why Men Fought in the Civil War* (New York: Oxford University Press, 1997) —Lincoln Prize for 1998
- *The Struggle for Equality: Abolitionists and the Negro in the Civil War and Reconstruction* (1964) —Anisfield-Wolf Award in Race Relations for 1965
- *Drawn with the sword: Reflections on the American Civil War* (New York: Oxford University Press, 1996)

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Selected Publications:
- *Yankee Correspondence: Civil War Letters Between New England Soldiers and the Homefront* (edited with Mary Beth Sievens) University of Virginia Press: Charlottesville, 1996
- *The Romance of Reunion: Northerners and the South, 1865-1900* (University of North Carolina Press, Chapel Hill, 1993)
- *Divided Houses: Gender and the Civil War*, co-edited with Catherine Clinton (Oxford University Press: New York, 1992)

| COMMENTS | RESPONSES |
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- 1 -

Gettysburg National Military Park Evaluation

Eric Foner

Columbia University

Along with James McPherson and Nina Silber, I was one of three historians who visited the Gettysburg National Military Park on August 18 and 19, 1998. We met with the superintendent, chief of interpretations, and numerous other staff members, and received a thorough tour of the park facilities and a detailed explanation of the Draft General Management Plan that seeks to alter the historical and environmental aspects of the park. At every point, the staff were helpful, courteous, and knowledgeable about the park and the Civil War history in which it holds so central a place. I believe that all the historians were impressed by the staff's determination to make the presentation of history at Gettysburg more informative, more up-to-date, and more comprehensive than is presently the case.

Since the General Management Plan calls for the construction of a new museum that will replace the present visitor's center, it may seem beside the point to comment on the deficiencies of the current presentation of history at Gettysburg. The superintendent and staff are well aware of present inadequacies. Nonetheless, it is worth reiterating briefly some of the weaknesses of the current situation.

At present, the museum/visitor's center is a disorganized hodge-podge of exhibits

and presentations that, taken together, fail to give visitors to Gettysburg a clear understanding of the significance of the campaign or its place in American history. The electric map and cyclorama, to be sure, offer vivid and dramatic visual presentations that help to situate the viewer with reference to the complex movement of troops on the Gettysburg site in early July, 1863. But Gettysburg is treated entirely in isolation. There is no indication of how the battle fit into the overall course of the Civil War (no mention, for example, of the simultaneous Vicksburg campaign, or of the fact that the hardest fighting of the war lay a year in the future). More broadly, the visitor learns almost nothing about the war itself – its causes, conduct, and consequences for American history. Surprisingly, the single-minded focus on the three days in July even leads to a slighting of Lincoln's Gettysburg Address, which offers a ready-made opportunity for reflection on the war's broader meaning.

In addition, despite the fact that Gettysburg was a critical victory for the Union, the metaphor that governs presentations today is that the battle was the "high water mark" of the Confederacy. Pickett's charge is the historical and emotional centerpiece of a Gettysburg visit, and the narration at the electric map and cyclorama devote far more attention to the personalities and tactics of Confederate commanders than to the Union generals. I heard a great deal about the calculations of Longstreet and Lee, but nothing about how Meade and his lieutenants planned for and executed the battle. In general, moreover, the valor of Confederate soldiers is stressed, while little is said of the courage of those who fought for the Union. The cyclorama narrative ends by quoting a

| COMMENTS | RESPONSES |
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- 3 -

Confederate participant – "we gained nothing but glory." The idea that there may have been both gain and glory in defending the Union is not considered. In the new museum, I would hope to see the "high water mark" theme deemphasized, in favor of a theme now relatively ignored -- that the Civil War was a "new birth of freedom" for American society

The "high water mark" metaphor and emphasis on Confederate valor derive, I think, from many sources, including the undoubted drama of Pickett's charge, the location of the visitor's center adjacent to the center of battle on the third day, and an old tradition that romanticized the Confederate army as a band of heroic individuals defeated by overwhelming resources and firepower. It also reflects Gettysburg's historic role as a symbol of national reconciliation, exemplified in the reunions of 1913 and 1938. But it leads inexorably to a view of the Civil War in which the meaning of the conflict lay in the heroism of individual soldiers, not the causes for which they fought.

The proposed new museum offers a golden opportunity to rethink the presentation of history at Gettysburg. The point is not to build a national museum of the Civil War, but to locate the Gettysburg campaign more fully within the context of the war's causes and consequences. Without abandoning the National Parks Service tradition of site-specific presentations, and without slighting the tactics, strategy, and movement of regiments or the courage of soldiers on either side, the museum ought to place the battle of Gettysburg in context – or rather in a series of contexts, military, political, and social. The six themes proposed as a framework for the new museum are an excellent starting

point.

Today, the word "slavery" is rarely if ever mentioned at Gettysburg. But theme one – the causes of the Civil War – requires that visitors be exposed to the ways in which the South's peculiar institution divided the nation. Not that slavery was the only cause of the war, or that the North, at the outset, fought for emancipation. But as Lincoln said in his second inaugural, everyone who lived through those years understood that slavery was "somehow" at the root of the conflict. The problem for historians has always been to explain that "somehow," and the new Gettysburg museum needs to try as well.

Giving more emphasis to slavery as a cause of the war links directly to the third theme – the soldiers and their reasons for fighting. In addition, it inevitably requires devoting more attention to emancipation as one of the war's most enduring consequences. Theme five – a new birth of freedom – provides an opportunity to do this, using the Gettysburg Address as a focus but moving beyond it to detail the role of African-Americans, abolitionists and others in affecting the government's decisions regarding slavery. It also offers the possibility of remedying one of the most glaring weaknesses of Gettysburg today – the almost complete lack of attention to blacks. There is a small wayside marker at the site of a farm owned by a free black family on the battlefield, and a small presentation in the museum regarding black soldiers. But the site itself offers abundant opportunities for a far more extensive treatment. The fact that black farmers fled the oncoming Confederate army can illuminate their fears of enslavement or, if they were fugitives, reenslavement by southern authorities. The work of local blacks in

## COMMENTS



helping to fortify Harrisburg and other communities deserved mention. In the cyclorama, there are at least three black figures – men carrying water or handling mules for the Union army – but they receive no mention in the present narration. No black troops fought at Gettysburg (and why this was the case needs to be explained) but both armies employed numerous black laborers and their presence should certainly be noted. Also relevant is the fact that many of the Confederates captured at Gettysburg were not immediately exchanged because the Lincoln administration halted the pow exchange program when the South refused to release captured black Union soldiers. Beyond the specific connection of African-Americans to the Gettysburg campaign, the broader role of black soldiers in the conflict needs a more extensive treatment than at present.

Another analytical theme that needs to be brought out more clearly is the impact of technology on the war. The museum today contains numerous cases filled with weaponry – rifles, revolvers, swords, etc. – as well as some small pieces of artillery. Interesting as they are to look at, these artifacts are not currently related to the ways the war brought the industrial revolution to bear on the battlefield, or linked to other innovations, such as the railroad, the telegraph, and iron-clad ships, all of which have led some historians to call the conflict the first modern war. It is not clear where among the current six themes this would fit; perhaps a seventh theme on fighting the war and how it changed needs to be included.

Finally, I agree that historical memory (theme six) needs to be examined in the new exhibitions. Gettysburg has always occupied a special place in the memory of the

## RESPONSES

Civil War. The story of how, when, and why monuments were erected on the battlefield (and the controversies this engendered) needs to be related. (The reasons why it took over a century for a statue of Longstreet to be erected can easily be linked to his role in Reconstruction and how this affected his historical reputation in the South.) So too does the role of Gettysburg reunions in the consolidation of a particular memory of the Civil War that privileged national reconciliation while ignoring some of the costs of reunion, especially the deprivation of the rights of African-Americans. Few museums today deal very effectively with historical memory as an independent subject; the proposed Gettysburg museum has the opportunity to do something strikingly original on this count.

Given that the new museum will open in 2002 or 2003, there seems little point in devoting much effort to revising the exhibits now on display. Indeed, four or five years is a very short time to plan a museum of the size and scope as that envisioned in the Draft General Management Plan. I urge the Parks Service, as soon as possible, to enlist a group of historical advisors who can work with Dr. Latschar and his associates to develop in detail how the six themes will be elaborated. Certain interim steps can, however, be taken immediately. First, the selection of books in the bookstore needs to be broadened. Like the visitor's center as a whole, the bookstore is strong on military campaigns and weak or idiosyncratic on the causes of the war, the role of African-Americans, the social history of the period, the war's impact on women, and other themes at the forefront of current scholarship. The choice of books subtly conveys an impression as to which themes the Park thinks are important, and which are marginal. Well before the new

| COMMENTS | RESPONSES |
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museum opens, the bookstore can be made more congruent with the six new themes.

It is also important to ensure that narrative presentations, whether at the cyclorama or by Park employees and licensed guides, offer a more broadly-conceived account. As noted, the cyclorama talk could certainly comment on the black figures in the painting. Then, too, the Park could try to develop new printed brochures on some of the themes now slighted – African-Americans and Gettysburg, the impact of the campaign on civilians, even the kinds of beliefs and commitments that brought soldiers on both sides to Gettysburg. The Park's web site is off to an excellent start, and can certainly be expanded in these directions as well. The wall of faces, a highly effective exhibit in the visitor's center, can be expanded to include some local civilians, women on the homefront, and laborers with the armies.

Gettysburg holds a special place among Civil War historical sites. The number of visitors dwarfs those of any other battlefield, and its constituency includes everyone from reenactors to students to a general public with only limited knowledge of Civil War history. The interests of all these groups need to be respected in planning the new museum. In my own experience as a curator of exhibitions, I have found that people, by and large, genuinely appreciate being exposed to new ideas. The staff at Gettysburg is to be commended for taking the initiative in moving the park in a positive direction and I fully support their effort to make Gettysburg more broadly conceived and up-to-date. Visitors to the park deserve no less.

GETTYSBURG NATIONAL MILITARY PARK EVALUATION

James M. McPherson
Princeton University

Nearly two million people visit Gettysburg National Military Park every year--almost as many as visit all other Civil War battlefield national parks combined. They come for many reasons, but common to all of these reasons is a recognition that the Battle of Gettysburg was not only the bloodiest in American history but also one of the most important battles in the history of the world. At Gettysburg on the first three days of July 1863, the Union Army of the Potomac turned back the most ambitious effort by the Army of Northern Virginia to force a conclusion of the American Civil War in favor of Confederate independence. As Abraham Lincoln expressed it in his famous address at the dedication of the National Military Cemetery four and one-half months after the battle, Union soldiers gave the "last full measure of devotion" at Gettysburg that the United States "shall not perish from the earth" but instead "shall have a new birth of freedom."

For many visitors to the battlefield, this is their first such experience. For some it will be their only tour of a Civil War battlefield. Thus a large responsibility rests on the shoulders of guides, interpreters, and staff at the park. With limited resources stretched thin almost to the breaking point, they do a good job. The visitor who views the exhibits at the Visitor Center and Cyclorama building, watches the brief film presentations, the electric map, and

## COMMENTS

the Cyclorama, takes the self-guiding auto tour, reads the wayside exhibits and listens to the wayside audios, and participates in one or more of the ranger-guided walking tours or talks that are offered seasonally, will come away with a reasonably full and sound understanding of the strategic context and specific tactics of the battle. Some of them will also gain an understanding of the soldiers' experiences, the impact of the battle on Gettysburg's civilians, and perhaps the importance of the battle in the larger context of the Civil War and of American history.

But most visitors will not experience all of these offerings. They will spend only an hour or two at the Visitor Center. Most do not view the electric map and Cyclorama or take one of the ranger-guided tours. Most visit only selected spots on the battlefield. Many take guided tours provided by licensed guides or by commercial tour companies. The Park Service has little control over the content of these tours, even though the licensed guides must pass a test designed by the Park Service. The focus of most exhibits and tours is narrow, covering weapons, tactics, and battlefield leadership more or less adequately but neglecting or distorting many important issues concerning the social, political, and strategic contexts and consequences of the battle.

Nowhere are these shortcomings more evident than in the exhibits at the Visitor Center and the Cyclorama building, which are the first things encountered by most visitors.

## RESPONSES

## COMMENTS

The artifacts, weapons, photographs, and the like at the Visitor Center are arranged in no particular order. They offer the viewer no coherent understanding of the causes, course, and consequences of the battle, much less of the war. The exhibits at the Cyclorama building (apart from the Cyclorama itself) are even thinner and more of a hodge-podge.

Nobody is more aware of these deficiencies than Park Superintendent Dr. John Latschar, Supervisory Park Historian D. Scott Hartwig, Chief Ranger Brion Fitzgerald, and their dedicated staff who hosted us during the OAH historical site review on August 18-19, 1998. The review committee consisted of Eric Foner, Nina Silber, and myself. We spent several hours with senior park staff reviewing plans for a new Visitor Center and other initiatives for improving the interpretive presentations. We viewed Visitor Center exhibits, the electric map, the Cyclorama, and the Park website, and toured portions of the battlefield and the town of Gettysburg. We also studied many of the park's official publications and reviewed the Draft Management Plan and Environmental Impact Statement that sets forth four alternatives for future battlefield interpretation and resource management.

Alaternative A would continue the present policy. This is unacceptable to park managers, and we agree. Alternatives B and C are similar in major aspects. They include construction of a new Visitor Center on a site located apart from

## RESPONSES

## COMMENTS

areas of major fighting and the restoration to the 1863 landscape of Ziegler's Grove, where the Cyclorama and Visitor Center are now located and where important battle action occurred. The new Visitor Center would offer state-of-the-art museum exhibits to tell the story of the background and causes of the war, the course of the war in all theaters, the strategic context of the battle of Gettysburg, the battle's consequences for the community and country, the subsequent course of the war, the postwar memorialization of the battlefield, and other important interpretive themes. This "story line" in the new Visitor Center exhibits would provide tourists with a much better preparation than they now receive for touring the battlefield. On the battlefield itself, Alternatives B and C would also vastly improve the visitor's ability to understand the battle by removing several hundred acres of trees that have grown up since the battle (mostly in the past sixty years) and that currently make it impossible to understand lines of sight, tactical deployments, maneuvers, and fighting on key parts of the battlefield. Such landscape restoration would be done with careful consideration for its environmental impact. Alternative D would incorporate all features of B and C and in addition would restore orchards, fences, and other 1863 features that affected troop movements and tactics during the battle.

Park management prefers Alternative C, with D to be added if and when it becomes feasible. The OAH visiting site committee

## RESPONSES

endorses these priorities. We recognize that the financial cost will be large, but the result will be worth every penny. The chances of congressional appropriations to carry out these major improvements, especially the cost of a new Visitor Center, are slim. Thus park management is negotiating a unique plan for public-private partnership, the final terms of which are still being worked out. If successful, the new Visitor Center will be in place by 2002 or 2003, while other improvements such as landscape restoration may take up to ten years.

Each member of the visiting committee decided to focus his/her report on different aspects of the park's needed improvements. Our recommendations have some themes in common, however. We agree that both in the museum exhibits and in the other interpretive materials offered by the park, more must be done to explain the causes and consequences of the war, the importance of the slavery controversy as the chief force disrupting the Union, and the abolition of slavery (Lincoln's "new birth of freedom") as one of the war's most important consequences. There should be more emphasis on the impact of the war on civilians and on the connections between the home front and the army in this war fought mainly by volunteer citizen soldiers who retained close ties to their families and communities; a fuller discussion of the values, ideologies, and experiences of the soldiers themselves; a greater effort to make the story of the war and the Battle of Gettysburg relevant to women and minorities--indeed to

## COMMENTS

all Americans who live in a 21st-century world shaped by the results of the Civil War.

The review committee agrees that the Visitor Center must be a museum of the Battle of Gettysburg rather than a museum of the American Civil War. The interpretive themes must be "site-specific"--i.e. they must grow out of the battle itself. Nevertheless, the site and the battle offer many opportunities to discuss most of the larger themes connected with the causes and consequences of the war and its political and social contexts as well as the strategic and tactical developments in the battle itself. Superintendent Latschar and his staff are as fully committed to these goals as the review committee. We were strongly and favorably impressed by the breadth and depth of their knowledge and understanding of these matters, their dedication to improvement, and their expert qualifications for carrying out the necessary changes. In considerable part, our reports consist of seconding and supplementing various ideas for improvement that they have already drafted.

In the division of tasks among the committee members, my subject is the interpretation of the battle as a military event. This is what the park currently does best. But there is room for improvement, especially in the subtle interpretive thrust of much of the material including the electric map and Cyclorama. One problem is the privileging of "Pickett's Charge" as the most important part of the battle. Perhaps it was, in some respects, but many visitors might get the

## RESPONSES

impression that it was the only part that really mattered. This may be a consequence of the location of the Visitor Center and Cyclorama only a short distance from the "high water mark," which is highlighted by the brochure for the "high water mark walking tour." This walking tour may be the only one taken by many visitors to the battlefield. Its centrality is reinforced by the Cyclorama, which of course depicts the climax of "Pickett's Charge."

Perhaps the location of the new Visitor Center nearly a mile from the "high water mark" will help reduce the over-emphasis on "Pickett's Charge." And the text of the audio presentation at the Cyclorama can be revised to emphasize that while this assault constituted the climax of the battle, the fighting on the first and second days elsewhere on the battlefield and the fighting at Culp's Hill on the third day were also important to the outcome of the battle.

The phrase "high water mark" which occurs repeatedly in exhibits, brochures, the electric map audio, etc. is also problematical. It reflects a subtle and perhaps unintentional but nevertheless pervasive emphasis on the Confederate perspective in battlefield interpretation (an irony, since most of the monuments are Union). Much of the narrative and interpretation in various media on the battlefield (including the audios at Oak Hill, the Mississippi monument, the Virginia monument, and the point of woods on Seminary Ridge) focus on Confederate actions and leadership. To be fair, the 1st

## COMMENTS

Minnesota, 20th Maine, and the Vermont Brigade receive due emphasis, and all of the Park roads except Confederate Avenue are named after Union generals. But the visitor hears and reads a great deal about Lee, Longstreet, Pickett, Armistead, and other Confederate generals, but much less about Meade and other Union commanders except perhaps Sickles and Hancock. Of course this perspective reflects in part the reality that Confederate tactical as well as strategic offensives mainly shaped the course of the battle. But after all, Union tactical leadership was more effective than Confederate, and the Army of the Potomac did win the battle. Perhaps if the "new birth of freedom" rather than "high water mark" became the interpretive mantra, the perspective would be more accurate--and, incidentally, might become more relevant to the majority of potential battlefield visitors.

Another way that this theme could emerge from a battlefield tour without being artifically forced is to utilize the fact that no fewer than eight black farmers owned or rented land on what became the Gettysburg battlefield. Some of them, such as the Brian family whose house still stands near the Cyclorama building, had fled before the Confederates arrived. So had most of the two or three dozen black families who lived in the village of Gettysburg. They did so because some of them were fugitive slaves from Maryland or Virginia and they had a well-founded fear that the Confederate army would seize them and return them to slavery (the Confederates

## RESPONSES

did precisely that with a number of African-Americans they captured near Chambersburg and elsewhere). Even legally free blacks were not immune from kidnapping. Their experiences offer a battlefield guide an excellent opportunity to discuss the role of slavery and blacks in the war and provide a tie-in between the battlefield and the local community--two themes inadequately treated in park literature and exhibits at present.

A related opportunity arises from the question of prisoners of war. At least 10,000 unwounded Confederate and Union soldiers were captured during the battle. What happened to them? How were they conducted to the rear? Who guarded them? Where did they go after the battle? What was their experience as POW's? These questions come up almost every time I give students and other groups a tour of the battlefield, usually when I describe the Union capture of Confederate Brigadier-General James J. Archer on the first morning of the battle. Currently there is almost nothing in park exhibits, literature, or waysides that addresses these issues or points out that most prisoners captured at Gettysburg were not exchanged before the final months of the war because the exchange cartel broke down over the issue of Confederate refusal to treat captured ex-slave Union soldiers as legitimate POW's. Here is another opportunity to discuss slavery and black soldiers, and it also offers an opening to describe the shattering impact of the battle on a town of 2400 people

| COMMENTS | RESPONSES |
|---|---|
| suddenly overwhelmed by 20,000 wounded soldiers, including some 6,000 captured Confederates.<br><br>I wish to put in a plea of support for park management's plan to restore the pattern of fields, woodlands, and woodlots as closely as possible to the configuration of 1863. Because nearly a thousand acres of the battlfield that were fields or pastures or open woodlots in 1863 are woodlands with thick undergrowth today, it is extremely difficult to describe and interpret key parts of the battle to visitors. When I give tours, I find myself constantly reiterating that certain thick woods were not there in 1863 and that troops could see each other and engage each other in particular areas that today are an impenetrable forest of trees, saplings, and undergrowth. I recognize the ecological dangers of tree removal, but if carefully done there will be some ecological benefits as well as enormous interpretive benefits.<br><br>Finally, in spite of my reference in the opening paragraph of this report to Gettysburg as the most important battle of the Civil War and one of the most important in world history, this there can be overdone. Some of the presentations at the park tend to overdo it. Yes, Union victory at Gettysburg did turn back a major Confederate bid for victory. The battle was therefore a critical turning point in the Civil War. But it was not the only one. And one reason for its importance was the capture of Vicksburg at the same time, which may have had a strategic and psychological impact equal to | |

Gettysburg's. And the war did continue for almost two more years. The fighting in 1864 was more relentless and bloody than anything that had gone before. The message conveyed by some of the literature and exhibits at Gettysburg might almost lead the uninformed and unwary visitor to believe that it was the last battle of the war except for some mopping up. The story line in the new Visitor Center museum, in the electric map, even in the Cyclorama as well as in some of the self-guiding literature, needs to correct this impression in order to place Gettysburg in its context as the bloodiest and perhaps most important single battle of the Civil War, which did not, however, decide the outcome of the war all by itself.

Gettysburg National Military Park has a dedicated, determined, knowledgeable staff headed by Dr. Latschar. They are already moving in the direction suggested by many of these recommendations. With public understanding and support, they will be able to carry out their mission to make a visit to the park the premier Civil War experience for the 21st century.

REPORT FOR THE ORGANIZATION OF AMERICAN HISTORIANS (OAH) AND THE NATIONAL PARK SERVICE (NPS) ON GETTYSBURG NATIONAL MILITARY PARK

Nina Silber, Associate Professor of History at Boston University
August, 1998

On August 18-19, 1998 a team of OAH historians - Eric Foner, James McPherson, and I - visited the Gettysburg National Military Park in Gettysburg, Pennsylvania. Here, with the assistance of a very competent and experienced National Park Service staff, we gained a sense of the tremendous potential which exists at the Gettysburg site for conveying to the American people the meaning and significance of the US Civil War and the place of Gettysburg in that conflict. We also gained a better understanding of the numerous obstacles which presently make this educational objective more difficult. This report considers some of the possibilities and problems at the Gettysburg site, especially in light of the Draft General Management Plan, prepared by the National Park Service, which lays out numerous changes that the Gettysburg staff hopes to implement. My report will also offer some specific recommendations for both the long-range and short-term planning for the site, with a particular emphasis on how the experience of non-combatants might be discussed at Gettysburg. (The other reports will focus on race relations and the military aspect of the Gettysburg story.)

Current Potential and Problems

The Gettysburg site may well be the best location that exists for educating both the American people and foreign visitors about the history of the American Civil War. Visitors have travelled to Gettysburg in increasing numbers over the last several years, with administrators estimating over 1,800,000 visitors for 1997 alone. Gettysburg attracts more visitors than other Civil War sites, and many of those visiting most likely come with only a general understanding of the war and the specific events of Gettysburg. In other words, people know that something big happened at Gettysburg, but often not much else. Other Civil War sites undoubtedly attract a larger proportion of visitors who have specific knowledge of battlefield actions. Gettysburg is also unique as the one significant Civil War site north of the Mason-Dixon line, giving its visitors, perhaps, a slightly different geographic base than visitors to

other sites. Gettysburg is thus positioned to enlighten a tremendous number of people about the Gettysburg battle and the larger story of the war.

At present, the current site does manage, at least partly, to illuminate some of this information to the visitors. The Gettysburg landscape, which is relatively free of late twentieth century structures, allows visitors to get a sense of a pastoral 19th century setting suddenly shaken by conflict. The monuments which have proliferated in the park over the last 100 years convey the deep meaning which Gettysburg holds for many people, and the Gettysburg National Cemetery offers an ideal location for understanding President Lincoln's (and the American people's) attempts to endow the conflict with a higher meaning. Park rangers do an excellent job of conveying different aspects of the Gettysburg experience to visitors, as do the Licensed Battle Field Guides who conduct tours for a fee around the park. The Electric Map provides a compelling introduction to the military dimensions of the battle, and the Cyclorama painting gives a dramatic rendition of late nineteenth century perceptions of the battle.

But, as the Gettysburg staff has already recognized, the facilities are also woefully inadequate and do not allow the park to live up to its full potential. The current Visitor Center is outdated and offers an extremely eclectic and unfocused view of the conflict. Visitors are not presented with a clear story of how and why the battle of Gettysburg unfolded, to say nothing of larger political and social questions of the Civil War. The separate Cyclorama building likewise gives visitors only a piece-meal view of the battle's role. Finally, large numbers of trees, and the absence of important agricultural demarcations, give visitors a skewed vision of the battlefield, making it difficult to understand many of the tactical and strategic considerations of the battle. With this in mind the NPS has formulated their Draft General Management Plan which lays out various alternatives for changing the site. They have also identified six specific themes to be more carefully highlighted in the message which the park and its resources convey. These themes include the larger history of the Civil War; the specific place of the Gettysburg campaign; the varied experiences of the soldiers who fought at Gettysburg; the battle's effect on civilians both near and far; the message of the Gettysburg Address; and the meaning of the memorialization of Gettysburg. Our team of historians enthusiastically endorses the proposals in this Draft General Management Plan, specifically the goal of implementing Alternative C which calls for extensive changes to the battlefield

## COMMENTS

## RESPONSES

3

landscape, so that visitors can appreciate the battle in its 1863 context, and for a new Visitor Center that can better convey the Gettysburg story.

There is, however, a somewhat larger problem which affects the way history is conveyed at Gettysburg, and which is not addressed in the Draft General Management Plan. The setting of the current Visitor Center, the subject of the Cyclorama painting, and many of the interpretive documents and materials all conspire to put an emphasis on Gettysburg (and specifically the events of Day 3) as the "High Water Mark" of the Confederacy. Consequently, materials stress Confederate leadership, Confederate tactics, and Confederate actions, and pay relatively less attention to the Union story. To some extent, this obscures the very significance which Abraham Lincoln sought to attach to Gettysburg, as a battle that symbolized "a new birth of freedom" for all Americans. Indeed, the battle of Gettysburg is significant not so much for bringing the Confederates to their "high tide", but for helping to secure a Union victory which ultimately would not only keep the American nation whole but would also guarantee freedom to four million African-American men and women. Our team of historians hopes to see a shift in interpretive emphasis at Gettysburg in this direction. This, we believe, will not only better illuminate the larger significance of the battle, but it will also greatly improve the visitors' experience with the Gettysburg Park.

Moreover, an improved Gettysburg site would also present the history of this battle and of the Civil War without the same one-dimensional focus on the military side of the story. The Draft General Management Plan implicitly recognizes this need, by calling attention to themes that consider the experience of "average" soldiers and citizens; but it will be important to incorporate these themes fully into the Gettysburg story, and not simply as interesting sidebars. Recent historical analysis of the Civil War has begun to emphasize this social history of the war, noting how the war experience and the war's outcomes were critically influenced by events transpiring on the homefront and by men and women who served not in positions of political or military leadership but as "ordinary" soldiers, nurses, farmers, workers, and family members. A broader focus on this social history dimension of the war, and of Gettysburg, will also appeal to Gettysburg visitors, 60% of whom visit the park in family groups.

4

The Long-Term Changes

The proposed changes to Gettysburg, specifically those under Alternative C, open up exciting possibilities for improving the Gettysburg site and for more fully developing the themes identified in the Draft General Management Plan. Without question, Gettysburg requires a new Museum and Visitor Center complex. The present Visitor Center has a confusing and uninviting layout; exhibits are presented in an eclectic fashion; there is no clear story line which highlights the larger Civil War context for the battle; and many themes and issues which deserve discussion are overlooked altogether. As we discussed in our final meeting with the Gettysburg staff, a story line for a new museum exhibit might begin by providing the broader context for the growing tension between North and South and cover the crisis that led to the outbreak of the war. Then, this story line would go through the beginning phases of the war, leading the visitor gradually toward a more specific focus on Gettysburg. After examining the battle and its consequences specifically, the exhibit could then broaden its focus again to the war overall, conveying the fact that nearly two more years of war lay ahead and some of the worst fighting of the war was yet to come (something which is often slighted in the present material and exhibits). A good ending point might be the reunions at Gettysburg - up to and including the 1938 reunion - as a way to discuss the price paid for national reunification, especially in terms of race relations and civil rights.

As noted above, though, this framework must incorporate a broader conception of the war and of the battle, beyond the critical questions of political and military decision-making. A new exhibit should convey the idea that the Civil War occurred not just between Union and Confederate leaders, but that it was a conflict that engulfed millions of "average" men and women; that enlisted men in both armies had to prepare themselves for war and engage in the actual fighting; that family members in both the North and South had to cope with the absence of loved ones; that civilians frequently suffered hardships as a result of military actions. Ideally, visitors to this new exhibit would learn how non-combatants as well as soldiers shaped the war experience, that civilian actions and the civilian presence had the power to assist

| COMMENTS | RESPONSES |
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or deter the efforts of the two armies. Family groups, who visit the park in significant numbers, will no doubt be interested in learning about the war's effect on women, children, and young adults.

There are a number of ways in which this social history dimension might be highlighted. One possibility would be, in addition to the larger story, to interweave the stories of four or five individuals - including in this number perhaps a civilian who lived on or near the site of the battle, perhaps a woman who came to the site afterwards to nurse wounded soldiers (or possibly someone who had come to look for a loved one), perhaps a relatively unknown soldier from both sides of the conflict. A number of women provided written accounts of their nursing experiences at Gettysburg (see, for example, Sophronia Bucklin, In Hospital and Camp and Henrietta Jaquette, ed., South after Gettysburg: Letters of Cornelia Hancock, 1863-1868) and these could certainly be used to develop the story of women nurses at Gettysburg more fully. Likewise, the story of Gettysburg civilians also needs more attention. Many visitors may have already heard of the story of Jennie Wade, making this a useful starting point for a larger discussion of civilians on the battlefield, or in the town, including some attention to children and youth. And, given the desire of the staff to enhance the ties between the battlefield site and the town, a further exploration of the civilian role might help accomplish this. For example, the exhibit could examine the effect of the battle on civilians in the town and also (perhaps in a separate document) direct visitors to in-town sites.

I would also urge that in those parts of the exhibit that examine the soldiers and their lives that the women, family members, and civilians at home not be ignored. This would include examining women who may have accompanied men in the army (both as family members and as "camp followers"), considering what women were doing in the absence of men, and looking at the strains that war put on family ties. Indeed, it would be important to highlight the way soldier morale was often affected by the type of support (or the lack of support) received from folks back home. The exhibit might, in fact, include some correspondence between a soldier at Gettysburg and family members - including women and children - at home.

Finally, instead of just showing artifacts on display, a new exhibit could provide a better sense of how various Civil War items would have been used by soldiers and civilians. This is done occasionally in

the current exhibit (e.g., a video which shows the loading and firing of canons) but should be done to a much greater extent. For example, visitors could listen to the music as it might have been played by a Civil War military band, or see how certain games might have been played in the soldiers' camps. Even more, the exhibit should never lose sight of the deadly consequences of these war-time artifacts and should eschew the current presentation of rows and rows of rifles in favor of an exhibit that provides a more graphic connection between the weapons and their gruesome effects.

Outside the Visitor Center, on the battlefield itself, the presentation of the civilian experience could again be enhanced. This would include improved waysides identifying farms at the time of the battle (including waysides that denote locations of farms or houses no longer standing) and rehabilitating the pattern of fencing, orchards, etc. to denote the 1863 agricultural landscape. This, of course, could graphically convey the way civilian lives - and the way they chose to situate their presence on what would be a crucial site of battle - affected the military contours of the battle. The site also needs a better venue for understanding the care of the wounded on the battlefield (which would include some discussion of medical personnel - women and men). Acquiring and/or making use of structures on the battlefield site that were used as hospitals would facilitate this. In addition, the park might also collaborate with the town to highlight the churches or other buildings in town that were also used as hospitals after the battle.

Finally, the park should highlight the civilian theme through interpretation and waysides at the Gettysburg National Cemetery. The death of soldiers, after all, had a tremendous effect on non-combatants who mourned, remembered, and carried on their lives, after their loved ones were gone.

The Short Term Adjustments

In the short term, before the proposals in the Draft General Management Plan are fully implemented, the Gettysburg staff can change the way the civilian story is conveyed through existing park materials. The staff should, for example, consider developing some printed brochures or handouts that discuss different aspects of the civilian experience. A brochure on the care of the wounded, for example, would consider not only the role of male and female medical personnel who came from afar to tend to the wounded but might also examine farm houses on the battlefield site that were taken over and turned into

## COMMENTS

## RESPONSES

7

hospitals. The current "wall of faces" in the visitor center also offers a venue for highlighting the civilian role. The exhibit thus could include pictures and information on residents of Gettysburg, or on female nurses who came to Gettysburg. As mentioned above, this could also be tied into a brochure which directed visitors to important sites in the town of Gettysburg. The park might even look into ways in which the Electric Map could be used to highlight the location of farms and farm houses on the site of the battlefield.

The Gettysburg web page also offers another way in which short term changes could be made relatively easily. The current web page has many interesting offerings - but with an overwhelming emphasis on the military experience of Gettysburg. Thus there is an extensive discussion of soldiers' lives, but almost nothing is said about women, families, and loved ones and how these people shaped the lives of common soldiers in the armies and how, even though parted, civilians back home affected the lives of those in battle. Even the section for children reveals this military emphasis and could certainly provide information on women nurses or on children in the town of Gettysburg, or on the farms at the battle field site.

Finally, the Gettysburg staff could also begin to incorporate more information on civilians simply by adding to its bookstore offerings. A number of books have been published in recent years that provide more of the social history of the Civil War and focus more on civilian lives. This would include: Philip Paludan, A People's Contest; George Rable, Civil War; Catherine Clinton, Tara Revisited; a reprinted edition of Mary Livermore, My Story of the War; Virginia Burr, ed., The Secret Eye: The Journal of Ella Gertrude Clanton Thomas, 1848-1889; Iris Chang, A Separate Battle: Women and the Civil War (for young readers); Edward D.C.Campbell; A Woman's War: Southern Women, Civil War and the Confederate Legacy; Mary Elizabeth Massey (Jean V. Berlin, ed.), Women in the Civil War (this is a new edition of the 1966 book Bonnet Brigades).

In short, the Gettysburg National Military Park has the potential to be an exciting venue for educating a growing public in the broad political, social, and military history of the American Civil War and the Gettysburg campaign. Because of the significance and great potential at this site, I hope

| COMMENTS | RESPONSES |
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| 8<br><br>Gettysburg can be a priority for receiving the type of assistance and support that will be necessary for making the proposed changes a reality. | |

October 13, 1998

Dr. John A. Latschar
United States Department of the Interior
National Park Service
Gettysburg National Military Park
97 Taneytown Road
Getttysburg, PA 17325

Re: Gettysburg National Military Park
Draft General Management Plan and
Environmental Impact Statement, August 1998

Dear Dr. Latschar:

We are writing to express our concern about the future of the bridle paths in the Gettysburg National Military Park. Our organization is dedicated to history and conservation issues.

a As students of history, we would like assurance that horses, the historical mode of transportation, will continue to be accommodated in the Park. Atop a horse is an ideal way to tour the Park and understand the distances, landscape features and orientation of troop movements from the nineteenth century perspective

We feel that partnerships between the National Park Service and the public are vital; we would like to be a part of such a partnership. It is imperative that those sitting down to work out solutions with respect to the future of horses in the Park represent a broad spectrum of bridle path users. In other words, although commercial users and non-profit groups supported by commercial users are an important part of any partnership, the truly non-profit users also must be included. As conservationists, we want to offer partnership with the National Park Service to assist with the maintenance of the existing trails and the planning and development of any new bridle paths. If horse trails are considered a problem for the National Park Service at Gettysburg, Plum Run Hunt would like to be part of the solution.

In addition, there are many other non-profit groups, all of which enjoy the Park from horseback for the historic pleasure derived, and all of which we believe would be honored to join a partnership with the

*Plum Run Hunt, 454 Swetland Road, Gettysburg, PA 17325*
*717-334-9759*

## Plum Run Hunt

a Chapter 2, Table 5 describes management prescriptions common to all alternatives. Non-historic trails would be removed and pedestrian and horse trails relocated to historic lanes. Horse trails would remain on the battlefield, but in different locations. Designers would develop trails that would create less damage to the resources while providing visitors with a satisfying experience.

National Park Service. A few of these groups are Gettysburg Riding Club, Central Maryland Saddle Club, Trail Riders of Today, and Chesapeake Plantation Walking Horse Club. Further, two re-enactment units which make frequent use of the bridle paths should be asked to take part in any partnership: the Fourth Virginia Cavalry and the 5th U.S. Cavalry, whose leader is Tom Williams.

It is required that written comments to the Draft General Management Plan be submitted by October 17, 1998 to John Latschar. Please consider the above comments, together with the seven points more specifically addressed within the attachment to this letter, to be the comments of the membership of Plum Run Hunt. This letter, in its entirety, is being forwarded to several other people who we feel are as interested as we are in the future conservation and historic preservation of the Gettysburg National Military Park, as well as the ability of the United States citizens who use the Park to view it from the most historic form of transportation, the horse.

Very truly yours,

PLUM RUN HUNT

Suzy A. Reingold

Suzy A. Reingold, MFH

*Plum Run Hunt, 454 Swetland Road, Gettysburg, PA 17325*
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## COMMENTS

Additional points with respect to the Draft General Management Plan:

b 1. **Use of resources:** The National Park Service is concerned about damage caused by horses, but frequent users of the trails observe that little maintenance appears to be done. The projected cost to remove 15 miles of non-historic trails is $819,000; the projected cost to restore 9.8 miles of 1863 lanes is $1,223,040. Would it be a better use of funds to apply a small amount to rehabilitate and maintain the existing bridle paths (not "lanes" or "recreation" paths) and spend the rest for some other purpose?

2. **Partnership:** Plum Run Hunt, and most certainly many other horse-related non-profit entities and clubs, would enter into partnership with the National Park Service to monitor and maintain the condition of the trails. This could preserve resources for other uses, and possibly increase resources through fund-raising efforts. Representatives of Plum Run Hunt, other non-commercial (and non-commercial related) horse organizations and re-enactment cavalry units should be included in the planning of any possible new or relocated trails and the development of policies for the use of the trails.

c 3. **Timing of work:** If new trails are created, they should be opened before any old trails are closed. Maintenance of existing trails should be coordinated to provide on-going use during any repairs.

d 4. **Horse trailer parking:** The Draft General Management Plan provides for moving the youth campground from McMillan Woods to the new visitor center area. McMillan Woods will be restored to its 1863 appearance. There is no mention of where, or even if, private horse trailer parking will be provided. Adequate, appropriate trailer parking space under the control of the National Park Service must be provided **within the Park**, easily accessible to the trails. Trailer parking outside of the Park is not an acceptable alternative.

e 5. **Use of licensed Battlefield guides:** Visitors on horseback, like visitors on foot or in private vehicles, should be able to conduct self-guided tours (as they are now).

f 6. **Bicycle use:** The Draft General Management Plan is not clear about this, but it appears that horses, pedestrians and bicycles may share some of the same trails, or that some of the current bridle and hiking path will be replaced by paved bicycle path. Horses are the historic mode of transportation, not bicycles. These are not recreation paths, but **bridle paths**. Bridle paths cannot be paved. Providing bridle paths to tour the Park is consistent with the Park's mission and purpose, while building recreational paths for bicycles is not.

g 7. **Removal of 576-1,015 acres of woods:** The National Park Service proposes to remove hundreds of acres of trees to restore the landscape to the appearance of 1863. Please reconsider this idea, as not in keeping with the conservation of our ever-changing **natural** landscape.

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## RESPONSES

b In Chapter 4, Section 4.3.2, Impacts on Natural Resources, paragraph 4 under soils, states that use of horse trails is causing severe soil erosion in prominent battlefield areas. Recent attempts to stabilize some small areas of the trail have not been successful. There continues to be significant erosion. The solution proposed by the draft GMP/EIS would be to place trails on historic lanes to minimize resource damage and maintenance.

c Existing trails would remain open until alternative trails are constructed unless park management decides that irreversible resource damage is occurring and then only, that section will be closed. That decision would be independent of the relocation and construction of new trials.

d Horse trailer parking would remain at McMillan Woods until the new trails are constructed along with new parking areas.

e All visitors to the park would have the opportunity to choose a licensed battlefield guide. This would not be mandatory.

f The draft GMP/EIS does not propose that bicycles and horses share the same trails. Bicycles will still be required to use the avenues to visit the park. Bridle paths would not be paved.

g NPS policy (NPS 77, 2:2) states that "The purposes of vegetation management are as diverse as the National Park System itself, ranging from perpetuating natural processes in natural zones to conserving the historic values of cultural zones...." Vegetation management is defined as the maintenance, establishment, or restoration of target vegetation that meets a park's management objectives. This may include an objective to preserve a historic site at a point in time in which periodic intervention may be required to counteract natural successional processes (NPS 77, 2:5).

Copies sent to:

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National Park Service
Northeast Region
143 South Third Street
Philadelphia, PA 19016

Robert Stanton, Director
National Park Service
Department of Interior
1849 C Street, N.W.
Mail Stop 3316
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Donald J. Barry, Acting Deputy Assistant Secretary
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1849 C Street, N.W.
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Bruce Babbitt, Secretary
Department of Interior
1849 C Street, N.W.
Washington, DC 20240

Senator Craig Thomas
U.S. Senator, Wyoming
Washington, DC 20510

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*717-334-9759*

## COMMENTS

*a statewide voice for Pennsylvania's heritage*

October 16, 1998

John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325-2998

Re: Comment on the General Management Plan;
Request for "Interested Party" status in consideration of the disposition of the Cyclorama Building

Dear Dr. Latschar:

Preservation Pennsylvania has reviewed the General Management Plan for the Gettysburg National Military Park (GNMP). We have also followed closely the recently completed review of the determination of eligibility of the Cyclorama Building by the Keeper of the National Register of Historic Places. While we support many of the elements of the General Management Plan, including the need for a new visitors center, we believe that now that the Cyclorama Building has been determined eligible for the National Register, the future of this architecturally and historically significant building should be given thorough and careful consideration.

As part of that consideration, Preservation Pennsylvania wishes to be included as an "interested party" in the Section 106 process. As the only statewide not-for-profit historic preservation organization for the Commonwealth, Preservation Pennsylvania stands ready to be of assistance as the assessment of the future of the Cyclorama Building moves forward through the Section 106 process.

As part of that process, it is Preservation Pennsylvania's position that the future of the building should be addressed as an issue completely separate from the need for a new visitors center.

## RESPONSES

### Preservation Pennsylvania

Gettysburg, page 2

Thank you for the opportunity to comment on the General Management Plan and to be included as the Section 106 process addresses the future of the Cyclorama Building.

Sincerely,

Caroline E. Boyce
Executive Director

cc: Martha Catlin, Advisory Council on Historic Preservation
Brent Glass, Pennsylvania State Historic Preservation Officer
Janet Klein, Chair, Pennsylvania Historical and Museum Commission
Brenda Barrett, Bureau for Historic Preservation
David Morrison, AIA Pennsylvania

## COMMENTS

Oct. 16, 1998

Dr Latschar,

This letter is to inform you of the total support of all 66 members of the Gen. Robert F. Hoke / William T. Hoke Camp #1616 Sons of Confederate Veterans, of the plans to build a new visitor center and to return the battlefield to its' 1863 condition.

I am also authorized to inform you of the total support of all 9 members of the Gen. Robert D. Johnston Chapter #247 Military Order of the Stars + Bars of the above stated plans at Gettysburg National Military Park.

Kirby D. Lechner
Lt. Cmdr. Gen. Robert F. Hoke / William T. Hoke #1616 SCV
Cmdr. Gen Robert D. Johnston #247 MOSB
Western Brigade Cmdr. - N.C. Division SCV.

K.D. Lechner

## RESPONSES

**Sons of Confederate Veterans Camp # 1616 and Military Order of the Stars and Bars Chapter # 247**

Author: "Claire DeCecco" <declar@erie.net> at NP--INTERNET
Date: 10/15/98 9:06 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: "Dale DeCecco" <ddececco@eriesd.iu5.org> at NP--INTERNET
Subject: GMMP Plan Input
---------- Message Contents ----------

Strong Vincent Commemoratives Committee

Merrill "Bud" Dever, Chairperson

Claire DeCecco, Sec.

P.O. Box 8935

Erie, PA 16505

(814)454-1861 Sec. (814)456-6199 fax

To: Superintendent Dr. John Latscher, GNMP

From: Merrill "Bud" Dever, Chairperson

Claire DeCecco, Sec

Fax: 814-456-6199 Declar@erie.net

Date: October 15, 1998

Message:

Dear Dr. Latscher:

The Strong Vincent Commemoratives Committee has studied the GM in the presented format. We strongly support alternative "C" with the following reservations:

a 1.. The scope location and theme of "Fantasy Land". More details should be presented.

b 2 . A traffic plan, which would ban bus traffic in certain, congested areas or closing roads to vehicular travel should be more available for study and suggestions.

c 3.. The "National tower" issue should be determined either as part of the plan or removed from it.

d 4 Inclusion of Citizen Participation Programs like "Adopt-A-Position" to assist in monument adoptions should be considered and properly staffed.

If an Advisory Committee of concerned citizens is planned our Committee would be honored to participate. Good Luck on the outcome

Respectfully

Merrill "Bud" Dever 814 833 9645

3333 West 32nd Street, Erie, PA 16506-2703

## Strong Vincent Commemoratives Committee

a NPS refers to the tract of land south of Hunt Avenue and east of Taneytown Road as "Fantasyland" because it was the site of a children's amusement park at the time of its purchase by the NPS. The 1982 GMP proposed, and a 1989 Development Concept Plan/Environmental Assessment detailed, a new administrative facility to be located at Fantasyland. The draft GMP/EIS carries forward this already approved recommendation. The 1989 plan would be updated if necessary when funding for the proposal is received.

b The specific details of the proposed traffic management system have not yet been designed. The detailed implementation study necessary to further define the proposed system would be completed after NPS selects an alternative.

c It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, removal of the Tower has been added to the final GMP/EIS.

d Many groups have adopted monuments, and others raise money to preserve and protect them. One full-time staff member and two seasonal workers support the many volunteers who donate their time to preserve monuments and battle positions.

Working Group at Gettysburg
P O. Box 4247
Gettysburg, PA 17325

September 12, 1998

Dr John A Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
P.O. Box 1080
Gettysburg, PA 17325

Re: Correction to the date of NOTICE presentation

Dear Superintendent Latschar:

I am writing to amend the heading date on the NOTICE that was provided to you last evening for entry into the official record. This communication was presented to you at the opening of the meeting on September 11, 1998 and concerns the "Subject: Protest over Failure to Convene 'General Public Meeting'."

As you may have observed, the date on the heading of this NOTICE incorrectly identified the date of presentation as "September 1, 1998." This was a typographical error that has been corrected in the enclosed amended NOTICE that accurately identifies the date of presentation as September 11, 1998

Please note this correction and include the NOTICE into the Agency's official record of the meeting held by the National Park Service last evening September 11, 1998.

I regret this error and appreciate your compliance in this request.

Sincerely,

Craig Stark

Craig Stark

Enclosure

cc: Katherine A. Meyer, Esq.
John R. Fenstermacher, Esq.

## Working Group at Gettysburg

**PERSENTED FOR ENTRY INTO THE OFFICIAL RECORD OF THE PUBLIC MEETING CONVENED ON SEPTEMBER 1, 1998 BY THE NATIONAL PARK SERVICE AT 7:00 PM IN THE HOLIDAY INN, GETTYSBURG, PA.**

**NOTICE**

**To: John A. Latschar, Superintendent of Gettysburg National Military Park**

**From: Craig Stark, Director of Working Group at Gettysburg**

**Date: September 11, 1998**

**Subject: Protest over Failure to Convene "General Public Meeting"**

By way of this Notice, I hereby formally protest the failure of the National Park Service to adhere to the schedule and terms in calling for a "General Public Meeting" that was to be convened at this time and location. This meeting was to be part of the public review process pursuant to the National Environmental Policy Act (NEPA) and all other relevant federal laws and regulations.

I am presenting this objection to you as the Designated Federal Officer facilitating this meeting. As an interested citizen, it is my belief that if you proceed, your action will in effect serve to cancel the "General Public Meeting" and convene an additional, unscheduled "Public Workshop." Accordingly, I hereby request that you either summon a certified stenographer to produce a written record of this meeting, make a audio tape recording of this proceeding, or that you postpone this public comment process until you are able to do so.

This objection is based upon the National Park Service's deviation from the public participation in the NEPA planning process currently ongoing at this unit. Your intentions to convene this meeting deviate from the scheduled "OPPORTUNITES FOR PUBLIC INVOLVMENT," as was identified under your signature and distributed in official notification ('D18'), dated August 14, 1998, a copy of which is attached hereto. This notification was distributed as an enclosure in the release of the Draft General Management Plan and Environmental Impact Statement for the Gettysburg National Military Park.

Craig Stark

The WYOMING VALLEY CIVIL WAR ROUND TABLE
*Promoting Interest In and Knowledge Of America's Defining Event*

OCTOBER 13, 1998

MR. JOHN A LATSCHAR
GETTYSBURG NATIONAL MILITARY PARK
97 TANEYTOWN ROAD
GETTYSBURG, PA. 17325

DEAR MR. LATSCHAR,

I AM WRITING IN REGARDS TO THE DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT. ALTHOUGH I WAS UNABLE TO ATTEND ONE OF THE PUBLIC MEETINGS, I HAVE BEEN FOLLOWING THE DEVELOPMENTS OF THIS PROPOSAL VERY CLOSELY.

AFTER CONSIDERATION OF THE FACTS, I AM SUPPORTING THE LATEST PROPOSAL. I WANT TO THANK YOU AND YOUR STAFF FOR YOUR CONTINUING EFFORTS TO FIND A POSSIBLE SOLUTION TO THE PROBLEMS THAT THE PARK SERVICE IS FACING.

IF I CAN BE OF FURTHER ASSISTANCE, PLEASE CONTACT ME AT OR AT THE ADDRESS LISTED ABOVE.

SINCERELY YOURS,

MAUREEN FOLLMER
Maureen Follmer
VICE PRESIDENT

## Wyoming Valley Civil War Round Table

Author: "Sandra Abramowski" at NP--INTERNET
Date: 10/14/98 11:02 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: "S Seay" <sseay@npca.org> at NP--INTERNET
Subject: Gettesburg
---------- Message Contents -

Gettesburg National Military Park

Please do not include the movie in the Museum Plans. Please do carry out all other plans for restoration, preservation, etc.

Sincerely,

Sandy & Harry Abramowski

## Sandra & Harry Abramowski

## COMMENTS

M. N. Adams

Dear Dr. Latschar,

I truly was glad I attend the GNMP Workshop on Sept. 11, 1998. After three weeks of reading the Draft, the workshop put all questions to rest. The picture of the Gettysburg National Military Park, in 20 to 25 years, is very clear in my mind.

Alternative C is the only way to go. I'm very much in favor of it. It would be a tribute the memory of all the men who died at Gettysburg. It would also honor the Memorial Association's original plan for the Battlefield. I truly hope this plan goes through, so in 25 years I'll be able to see the "Real Battlefield and cemetary".

Sincerely,
Maureen D. Adams
Oct. 10, 1998

Member of The Humane Society of the United States

## RESPONSES

**M. N. Adams**

## Andrew Adler

Dr. John A. Latschar
Superintendent, Gettysburg
National Military Park
97 Taneytown Road
Gettysburg, PA 17325

October 16, 1998

Re: Proposed New Visitors Center and Museum.

Dr. Latschar:

I wish to give my support to the proposed plan to construct a new Visitors Center and museum at Gettysburg National Park. I feel that a new facility will allow for more adequate space to exhibit and properly store artifacts, maps, archival materials, etc. and will ensure historical preservation for future generations. The new facility will also provide space for improved educational and special interpretive programs.

Constructing a new Visitors Center on an alternate site will enable the area of the Union battle line along Cemetery Ridge to be restored to its original 1863 appearance. It is imperative that we continue to protect our history and our heritage so that future generations may discover and learn about our nations past.

Sincerely,

Andrew Adler

## COMMENTS

October 16, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

This letter is written in response to the request for public comment on the Proposed General Management Plan for Gettysburg National Park, as announced in the Federal Register of August 18, 1998.

The Park Service has failed to set objectives that encompass the needs of Gettysburg in its proposed management plan. The Park Service correctly addresses preservation of civil war relics and archeological sites, and partial restoration of the battlefield. The Park Service gives no attention to Gettysburg as a civil war memorial park. The memorial park aspect of Gettysburg was included from the beginning as beautification of the field, not just monuments to engaging military units. For the last 100 years, the beauty of the park has been as much an attraction as the military details of the engagement.

I remember talking to a veteran of the Gettysburg campaign at the 75th Anniversary of the Battle of Gettysburg. He mentioned that he and some of his comrades were planning to plant trees on the battlefield as a memorial to his fallen fellow combatants. Many of the trees now present on the battlefield were planted as living memorials to the soldiers who died on that field. The present landscape is as much a part of the battlefield as the original condition of the site. Removing large numbers of trees is anathema to the symbol they represent. In addition, returning the battlefield site to its original condition would require the razing of a great portion of the Gettysburg Borough. Clearly it is impractical to return the battlefield site to its exact condition at the time of the 1863 engagement. The present landscaping is a reasonable compromise.

a Get rid of the Gettysburg National Observation Tower. To tolerate such a structure and commercial enterprise in proximity to a national cemetery is a sacrilege. Imagine the public outcry if such a structure were placed next to Arlington National Cemetery. The soldiers buried at Gettysburg are heroes, equally with those at Arlington. They deserve the same respect.

b It should be recognized that the museum commercial site planned for Route 97 complements a proposed shopping mall for the intersection of Route 97 and the Pennsylvania Route 15 Gettysburg bypass. This dumbbell commercialization can only worsen traffic congestion. Just as with Zion and other national parks, the auto is the true menace at Gettysburg. The reason for the rejection of other suggestions in favor of Alternative C by the Park Service is to find a place to park the cars.

## RESPONSES

### Arthur Aiken

a It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, the removal of the National Tower has been added to the final GMP/EIS.

b The draft GMP/EIS discusses these developments on page 248. However, the draft GMP/EIS analyzes the changes created by NPS actions, not the changes that may result from the actions of others. More information about other developments and the potential cumulative effects of private, state and local government and NPS actions have been added to the final GMP/EIS. NPS is cooperating with the comprehensive traffic and transportation study that is being undertaken by the Pennsylvania Department of Transportation in 1999. It will analyze and recommend projects to improve traffic flow and safety for locations in and around Gettysburg and the townships surrounding Gettysburg National Military Park. This comprehensive traffic and transportation study should provide the information you suggest.

Go back to one of the earlier plans; namely, combining the Fantasyland and Tower sites with enough additional land south of the area adequate to park the necessary number of cars. Mount a public campaign to raise money for purchase of the Tower site and construction of a new center to house relics. In addition, lobby congress for required extra maintenance and preservation funds.

Sincerely,

Arthur C. Aikin

Arthur C. Aikin

## COMMENTS

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

September 15,1998

Dear Dr. Latschar,

I am writing to let you know that I think you are doing an excellent job at a nearly impossible task. You clearly are trying to do the best by everyone and everything. I see this as including a huge number of tasks. You are trying to maintain the collection in the best possible way (including the Cyclorama painting), and maintain the actual battlefield in a way that makes it possible for visitors to learn about the battle and yet preserve it in a respectful way that might please the historians and honor those who served here. You work to entice visitors to come and make use of the park (visitors who want more than a poorly climate controlled old style museum with outdated technology). You hope to correct a situation where building has been done on key areas of the battlefield. And you have to struggle to keep the "locals" happy - even when they seem more concerned about personal wealth and income than the above and present mostly a fierce resistance to change of any kind. All of this must be done without the US Congress, who has given you this task, providing you with the means to do it! I wouldn't be surprised at any time to read in the local paper (shall I even mention how badly you are treated by a biased local press?) that you have decided you don't need this and are moving on.

Please know that there are people here who realize what a difficult task you have and what a good job you are doing. Unfortunately, we rarely come to the hearings because we have no complaints or arguments to voice, and the press has no interest in what we think. I hope that you will derive a bit of encouragement from this letter.

Sincerely,
An Adams County Resident

(I'm not signing my name because I hope that you will see me in many people with whom you come into contact)

## RESPONSES

### An Adams County Resident

## Jeffrey A. Anderson

Jeffrey A. Anderson

October 14, 1998

Gettysburg National Military Park
Attn: Superintendent John Latschar
97 Taneytown Road
Gettysburg, PA 17325

RE: Draft General Management Plan and
Environmental Impact Statement

Dear Superintendent Latschar,

I have reviewed the Draft General Management Plan (GMP) for the Gettysburg National Military Park (GNMP) and am advising the park Service that I support, with recommendations, Alternative C of the Plan. I am pleased that the Park is seeking to restore reasonable areas of the 1863 landscape. I also believe that both Alternatives A and D are extreme options that are not good for the Park in accomplishing its mission.

As I understand, the mission of the Park is to preserve and protect and also to provide understanding of the events that happened there. I believe that the interpretive themes are excellent in scope as well as long overdue. I am pleased to see the Park dealing with the causes and the consequences of the war, military, social and economic.

I also feel that the removal of woodlots and other modern features is acceptable since the mission of this park is the presentation of the historical nature of the area and not preservation of the current natural resources which is the mission of other parks.

I am also pleased to see that interpretation will include the townspeople of Gettysburg. To fully understand the impact of the Battle, everyone must also understand the impact on the citizens of the Gettysburg area.

## COMMENTS

I also want to restate my support for the direction being taken by those involved in creating a new Visitor Center/Museum facility. I am pleased to see that many changes have been negotiated with the developer to improve on his initial plan. I strongly support a new facility and believe that Gettysburg National Military Park, the premier Civil War battlefield site, should have a first class facility to present the story of the battle. It does not present a good model of the National Park system to have such a significant site with a functionally obsolete support facility. We need to have a facility which utilizes 21st century technology to deliver the history of the battle in order to present the most complete story possible, as well as capture the interest of future generations of visitors.

a While I agree with the restoration of the 1863 landscape, it needs to be done with caution and balance regarding environmental issues. It is recommended that detailed plans of phasing be done for changes to the landscape. We should not do the landscape restoration in a piecemeal and haphazard fashion. The restoration of the historic landscape must be environmentally sustainable and absolutely must be maintained as a guiding principle of the Park.

b The GMP addresses in several places the restoration of natural wetlands in various locations as a result of taking out features that drained these areas. The plan is silent about a possibility of losing wetlands as a result of restoring original features. Is the Park Service sure that no current wetlands will be affected by restoring 1863 features? I think the Plan should look into and address the potential of removing wetlands that may have been created by the construction of the modern features. There are federal laws against the destruction of wetlands that may impact plans for restoring original features.

c The Plan also gave a breakdown of the cost to make the changes discussed in Alternative C that was very good and could serve in the future as a tool to choose projects. The report is not very specific on methods to finance these changes other than to say that the federal government doesn't have the money and new sources have to be developed. Some additional detailed thought needs to be given on how at least some of the funds would be raised since the amount necessary is tremendous.

## RESPONSES

a The GMP is a long-term planning document that will guide the park for the next 10-20 years. Following final approval of the GMP/EIS, implementation plans would be written for specific actions, such as the removal of non-historic vegetation. These implementation plans would include identifying best management practices to address such questions as how to remove the vegetation in the most environmentally sensitive manner, when to do the removal so as to minimize the impacts to wildlife, soil, and water quality, to establish a timetable for the removal, and how to maintain those areas once they have been cleared. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas.

b The NPS would protect wetlands wherever possible. When wetlands may be impacted, the NPS would either mitigate the effects of the impacts or restore wetlands in areas that have been drained in the past. In the NPS's recently revised wetlands policy (Director's Order. 77-1) it states the goal for the NPS is "no net loss of wetlands." The GMP also states that there would be a gradual restoration of about 100 acres of wetlands through changes in the agriculture program (section 4.4.2). The landscape changes proposed by the action alternatives would not negatively affect any wetlands.

c The purpose of the GMP is to define the basic philosophy of park management and provide broad guidance to park managers. A GMP sets direction for resource protection and visitor use actions required to accomplish the park's mission. Park managers use these broad prescriptions to guide the hundreds of smaller decisions that are made over the 10 to 20-year life of the plan. Since availability of specific sources of funds over this time period cannot be predicted, the GMP establishes the goals; it then becomes the responsibility of park managers to seek funds and other assistance from all appropriate sources in order to accomplish those goals. As in the past, the park would continue to emphasize the critical role of volunteers, donations, and grants and funds from outside sources as a means of accomplishing the GMP's objectives.

d Finally, I do not like the idea of restoring all the pipe rail fences to delineate the commemorative park area from the rest of the battlefield. First, I think it might be a visual obstruction. The railings will also serve to channel people through the openings in the railings causing the openings to get heavy wear.

In addition, I think it might be an accident hazard. Children will feel 'compelled' to treat it like 'monkey bars,' climbing on it, swinging on it and trying to walk on it and possibly getting hurt. Furthermore, even though it is reasonably low, some people will still have trouble getting over it and will again possibly hurt themselves.

Furthermore, I believe the railings will be a high maintenance item even though they are steel pipes. Between the people climbing on them and the stress and strain from weather (temperature) changes over the years, these will begin to come apart. These railing systems were abandoned a long time ago after deciding to not preserve/maintain this feature. Did the Park Service investigate the reasons why the railings were abandoned? Not every design feature/decision is always a good one when initially used. That is why I think they should examine this feature more before planning to restore it.

In conclusion, the Park Service staff must be commended for its diligent effort in the preparation of the General Management Plan. The amount of work that went into researching and preparing this document can only be described as monumental. It is time that this Park operated under a strong direction, with clear goals and expectations. I hope that the resource driven nature of the plan can be maintained as a basis for all future GMPs.

Very truly yours,

Jeffrey A. Anderson

Jeffrey A. Anderson

d The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new, modern design element into the Battlefield Commemorative Resource Area of the park.

The reintroduction of pipe-rail fencing along some of the park's avenues should not deter visitor views. Although opinions vary about the aesthetics of various aspects of the both the commemorative design and the vernacular battlefield landscape, the pipe-rail fencing was nonetheless part of the original design effort that transformed portions of the battlefield into formal park environs. The fencing enclosed and set off the formal lawn, monuments, cannon, and avenues and was one of those "artistic and patriotic effects" envisioned by General Daniel Sickles in 1894. As one of the features that was to give "added glory and significance" to the Gettysburg battlefield, the pipe-rail fencing was an integral and early part of the park's design effort. Although today's visitors often demand immediate access to all parts of the battlefield, NPS considers that the reintroduction of avenue fencing would not unnecessarily impede respectful use of and access to the battlefield.

NPS anticipates that the time and costs to maintain pipe-rail fencing should be less than those needed to maintain post and rail fencing. Our records indicate that the original post and pipe fence that was erected along Howard Avenue in 1898 was still standing in 1962. Aside from minor repairs and painting the fence stood for more than six decades. In comparison, the park expects only about two decades of longevity from its wooden post and rail fences.

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>Now that the review period for comments is complete, please see that the General Management Plan moves forward to completion. I have submitted comments on the Plan in a separate letter.<br>Sincerely,<br>Name Jeffrey A. Anderson<br>Address | Jeffrey A. Anderson |

Author: "robert b. angelovich"
Date: 8/29/98 12:53 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gen'l Mgmt Plan , etc
---------- Message Contents ----------

Hello John,

Greetings from Connecticut. I hope that you and Janet and family are in fine health and are enjoying the summer. Peg and I never made it down this summer and it seems our summer has not been complete without the pilgrimage to G-burg. But we'll try again for the Fall. Hope to see you guys then.

I just wanted to send you some of my comments on the Draft General Management Plan that you and your folks recently put together. I see it as a comprehensive document containing a lot of thought and hard work, with the whole focus being to help and preserve Gettysburg NMP, in my estimation, the crown jewel of all the NPS Civil War sites.

I've read all four plans and think I understand the context of them. All are somewhat wordy but they do set a course for current and future guidance at the park. I believe one must plan their work and then work their plan. And I think that is what you folks have done as regards Gettysburg NMP and its future. We definately need new facilities for a Visitor Center and especially a Museum at the park.

My hangup is about the money (who pays it and who gets it).

I do have some questions regarding the planned Visitor Center and Museum at the park you could help me with.

Land Procurement (45 or so acres on the Baltimore Pike)

a Is this acreage being bought by the Foundation for the specific reason to block further development in that area ?

Will all existing buildings, etc., on site now, be removed and the land restored to Plan C specs ? Will the Foundation pay for this ?

What specifically defines that there shall be and will be NO development of those 45 acres on the Pike ?

How long will there be NO development (perpetuity)?

Is the cost of this parcel still in the range of 3 to 4 million dollars ?

If the cost per acre of that parcel is approximately $80,000 / acre, isn't that a very high price to pay the Foundation for one acre?

Will all those 45 acres be turned over to the GNMP by the Foundation at the end of the 20 year plan ?

b One more .. will the park get rid of the dammed Tower when all the dust settles ?

That's enough. I don't want to ramble.

Go get a 'cold one' and relax.

I respect what you're doing for Gettysburg. Hang in there.

Best Regards,

Bob Angelovich

## Bob Angelovich

a The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed new museum complex. This use would be removed and the land would remain open if any of the GMP action alternatives are implemented. NPS will continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the visitor center remains residentially zoned. A final agreement between NPS and the Foundation would specify that the land would remain undeveloped in perpetuity. The cost of the land was $2.75 million and was negotiated between the former owner and the Gettysburg National Battlefield Museum Foundation. The land and buildings will be donated to NPS after any loans are paid off.

b It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, the removal of the National Tower has been added to the final GMP/EIS.

## COMMENTS

Dr. Charlotte Armster
Dr. Jerold Wikoff

October 5, 1998

Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

To the Staff of GNMP:

We are writing to express our dismay that the Gettysburg National Military Park is proposing to cut down the trees on several hundred acres of the Gettysburg battlefield. We strongly oppose such action, and hope that you will reconsider such a decision.

It is our understanding that the Park Service wishes to return the battlefield to its 1863 landscape. If this is truly your motivation, then you need to reconsider the logic that has led you to this decision. Spending more than $2 million of public money to cut down trees is not going to return the battlefield to its original state. The roads will remain, the monuments will remain, and undoubtedly crops and other foliage will grow that is not precisely the same as when the battlefield was fought. It is absurd to think that we can maintain a battlefield as a static museum piece. Nature brings changes — and despite that, we can still understand and appreciate the magnitude of the battle at Gettysburg without seeing every blade of grass exactly as it was when the troops from the North and South fought here.

The Gettysburg National Military Park is constantly lamenting its lack of funds. Why then is the Park Service prepared to embark on a project that will do nothing to preserve artifacts nor to increase our understanding of what occurred here? What an incredible waste of the public's money.

We hope to hear from you that the Park Service will not be moving forward with this project.

Two Concerned Citizens,

Charlotte Armster/Jerold Wikoff

## RESPONSES

### Charlotte Armster / Jerold Wikoff

16 October 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

This letter is in response to your invitation for public comment on the GNMP Draft General Management Plan. After carefully reviewing all the alternatives but A (knowing that I would not be interested in a "no action" stance), I would like to offer my personal support for Alternative C, because this alternative offers the most realistic perception of any plan of future management for the park. I would offer two suggestions for modification when preparing the final draft:

1) I personally whole-heartedly endorse the spirit of the NPS's intent to attempt to capture the 1863 landscape as much as possible. I would, however, suggest that you remove from the final draft of the plan all but the most cursory mention of specific removal of woodland and restoration of same. I do not believe these specifics belong in a GMP, but rather in a Cultural/Natural Resource Management Plan. It is from such a plan that specific actions can be enacted. The GMP should embody the spirit of landscape restoration, but I do not believe specific tracts or areas should be identified therein.

a 2) Additionally, I would like to see the final draft have as an addendum or an amendment a fully-scoped Traffic Management Prospectus. Of all the aspects of the GMP in all its ramifications, this is the one which has the potential for the greatest impact on the local community, but it is the one aspect that has received the least attention from your agency in the assembling of the draft document. This may sound like heresy from a preservationist, but a traffic plan that would include public access to not only park resources but those of the commercial community could go a long way towards alleviating the concerns, whether they be real or imagined on the part of local businessmen. The Park is not an island, and could think of forming an alliance, however informal, with the extant commercial community.

b Concerning the Park's proposal for a new Visitor Center, I support the spirit of the NPS-Kinsley partnership and look forward to its final implementation. I would ask that the NPS and Mr. Kinsley consider further limiting the food service in the center in its size (a reduction to seating 150-175 would be more than sufficient to house "light service") and in its duration (morning and early afternoon hours would again be sufficient to take care of public needs, leaving self-service beverages for the other time periods the building is open).

Otherwise, the scope of the proposal is right on. A new, state-of-the-art facility for the visiting public is something this community has needed since the early 1970s. Naturally I, like many of my fellow taxpayers, would prefer to see the new structure built with public funds. Unfortunately, our elected officials have not seen fit to take care of this, their responsibility, and you have had the vision and foresight to seek an alternative course of action to do what needs to be done. Keep doing it, sir. The community at large will be the ultimate benefactor.

## Louise Arnold-Friend

a The detail you are suggesting is beyond the scope of the GMP. However, NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work.

PennDOT has prepared a scope of work for this study and is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation solutions for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS will continue to cooperate with PennDOT and the local municipalities as these plans are developed.

b NPS evaluated the impact of the cafeteria-style restaurant in the proposed museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

## COMMENTS

-2-

For the benefit of the other recipients of this letter, I would like to identify myself as a life-long resident of the 17325 Zip Code. I am one of their constituents, and I am truly embarrassed by how some of their other constituents have behaved over the course of this process. During the course of the past three years, I have watched in shock and embarrassment at the way you have been treated with verbal abuse, victimized by the press and others with blatant half-truths and out-right lies, and accused of all sorts of administrative philandering, none of which has ever been or can be publicly substantiated. I want our elected officials to know that not all of their constituents feel and act this way, and they should not be misled by a coterie of individuals who have nothing but fear and hatred at the heart of their actions.

Sincerely,

Louise Arnold-Friend

Louise Arnold-Friend

CF: offices of Congressman Bill Goodling and Senators Arlen Specter and Rick Santorum

## RESPONSES

**Dear Dr. Latschar,**

I would like to see
the new visitor center
at Gettysburg to move
forward now

Sincerely,

Name Jeff Augustat

Address

**Jeff Augustat**

## COMMENTS

Author: Angela Bailey at NP--INTERNET
Date: 10/2/98 1:35 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg Battlefield Bridle Path
---------- Message Contents -----

Dear Mr. Latschar,

I recently learned that the bridle paths and trailer accomodations currently available at the Gettysburg Battlefield may be changed. I hope you will take the time to read this e-mail and feel free to contact me if you would like more input.

I have been riding on the bridle paths for over 15 years. It is one of my fondest memories as a teenager riding on the Battlefield. I was able to get a much better history lesson than any of my fellow students.

I have taken several out of town guests to the battlefield for the bus tours. Their experience, while educational and enjoyable, is impersonal and lacks the behind the scenes feeling that one gets by riding horses over the trails. A much larger sense of appreciation and understanding of what a soldier may have felt is felt when riding the bridle paths through the woods--especially on horseback as many of the soldiers would have done.

The current trailer parking accomodation of McMillan Woods is adequate, but should be expanded. If it were to be eliminated, it would make safe parking for me, my horse and other guests nearly impossible. With any new plans, please ensure that sufficient, safe parking is available particular during peak times.

I strongly urge you to check with horsepeople for advice on how to revise the current bridle paths. I would like to feel confident that future generations of horseback riders can safely enjoy the educational experience that I had.

Best Regards,
Angela M. Bailey

## RESPONSES

### Angela M. Bailey

Author: MBailey4( at NP--INTERNET
Date: 8/28/98 2:48 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg

---------- Message Contents ----------

I try to visit Gettysburg at least once a year and often re-read Coddington's book on the Gettysburg campaign. I'm not able to absorb it all so I have to come back to it often. All I ask is that you keep the battlefield (and surrounding park area) in as natural (July, 1863) of a condition as you can. I realize that there are many pressures on you, but please, no more towers.

## Angela M. Bailey

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br><br>It is important that the Gettysburg General Management plan move forward. Thank you for your efforts in the developement of this plan<br><br>Sincerely,<br>Name John Baker<br>Address | John C. Baker |

Mr. John C. Baker

Author: "John D. Baniszewski" <John.D.Baniszewski
Date: 9/15/98 11:04 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Comments on General Management Plan

---------- Message Contents ----------

TO: Dr Latschar, Gettysburg National Military Park

SUBJECT: Comments on General Management Plan

Thank you for the opportunity to review the proposed General Management Plan. I found it to be an interesting and well written document, considering the Government-imposed requirements that you had to follow in writing it. I also learned many interesting facts concerning the history of the Park that I never knew before.

I find it exciting that the Park may be restored along the lines of your proposed alternative 3. I have visited the Park dozens of times to study the battle, and would dearly love to see it looking more the way it looked to the soldiers of 1863. I wish you the best in achieving your recommended approach. Please let me know if there is anything I can do to aide your efforts. I understand the complexity and difficulty of getting the new Visitor-Center approved. Considering Congress' mood toward budget issues and the condition of the current Visitor Center facilities, I feel you are doing what is best for the Park.

I have only a few comments on the plan. I hope they are not getting into too much level of detail.

a. Maintenance costs associated with Alternative 3

a It seems that Alternative 3 would greatly increase the amount of yearly maintenance required for the park. I see in your budget section that you have added a number of positions to the future park staff. However, only a few of these positions seem tied to grounds maintenance. Maintaining the additional miles of fences alone seems like a labor-intensive job. I was not sure from reading the plan that these increased grounds maintenance costs had been considered.

b. Use of non-historical materials with Alternative 3

b I saw no discussion of trade-offs between use of historical versus non-historical materials for Alternate 3 (or 4). One significant example would be the use of pressure-treated wood versus untreated wood for the greatly increased mileage of fencing. It seems that use of non-historical material could greatly reduce maintenance costs. A good example is the cast-iron carriages used for the cannon at Gettysburg, since these have lasted a century so far, greatly outliving historically-accurate wooden carriages. The discussion of Alternate 4 almost seems to rule out use of such materials.

c. Visitor safety and park resource protection

c With Alternate 3 and 4, there would likely be greatly increased safety issues. Today, people can walk the battlefield with comparatively few obstructions. I imagine that the addition of many miles of fence line will impede such walks. It seems undesirable to have people climbing fences constantly. Would there be adequate "non historical" fence openings to allow people to walk the field? Alternate 4 would seem to preclude this. In addition to safety, there also seems to be an issue of protecting the restored battlefield features. Not long ago, I visited Spotsylvania Battlefield. At the Angle, the Park Service had constructed several small pedestrian bridges over the remains of the Confederate earthworks, to keep them from being eroded by foot traffic. Have similar preservation measures been considered? Alternate 4 would again seem to preclude this.

Once again, best of luck to you. I appreciate the outstanding job you and you people are doing at the Park.

John Baniszewski

## John Baniszewski

a Overall staffing needed to implement any alternative in the draft GMP/EIS is partially based on Gettysburg NMP's ability to utilize volunteers to help with much of its maintenance requirements. Along with additional maintained areas being added to the park, several existing areas are being restored to their natural state and will not require the level of maintenance they now receive. Maintaining the additional fencing would be the greatest challenge to the maintenance staff, but between the additional staff, volunteers and additional contracting of maintenance needs, NPS believes that it could be accomplished.

b The use of pressure treated materials in fencing is acceptable. NPS could use a combination of pressure treated and non-pressure treated materials to prolong the life and reduce the maintenance of existing and proposed fencing and at the same time protect the environment.

c Although additional miles of historic and commemorative fencing would be erected in the park under Alternatives C and D, NPS would provide opportunities for hikers and those who are walking the grounds to access the battlefield. This access could be provided by use of gates, stiles, openings or other unintrusive or historic means in the fences. In addition, historic circulation systems such as field lanes, farm lanes, and woodlot roads may provide ways for visitors to walk from one point on the battlefield to another. If cultural resources such as breastworks, monuments, walls or types of fencing are endangered by pedestrian or vehicular erosion, NPS would take measures to protect those resources. Agency policies and the National Historic Preservation Act, as amended, provide guidance for the rehabilitation and care of historic landscapes and features, including the addition of protective measures and structures that are compatible with the historic site.

## COMMENTS

Dear Dr. Latschar,

I am a former member of the First Corps of the FNPG who has resigned from the group because of its support for the museum/visitors center complex. While the GMP has important points, the new complex is totally out of line. Restoring Ziegler's Grove in order to get support to build the complex, is wrong, too. Of course, people will vote for the project when they see that! The ground was destroyed years ago when the buildings went up. The money would be wasted when it is needed for preservation of endangered battlefield land. The old center should be renovated and a museum for a fraction of the $40 million be built elsewhere - NOT on the proposed battlefield site!!!

Sincerely,

Name Ulrike K. Baumann

Address

## RESPONSES

Ulrike K. Baumann

CLIFFORD K. BEBOUT I.

August 20, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa. 17325

Dear Dr. Latschar,

I am writing this letter to show my support, for the negotiations being conducted by the National Park Service for the Gettysburg National Military Park. I support Alternate C of the General Management Plan and hope that the project moves ahead quickly.

My father brought me to Gettysburg for the first time in 1963 and since that time I have been back many times. Each time I return to this field of honor, I always learn something new and returning always fills me with a sense of deep admiration and respect for those that fought and died for their beliefs.

The men who fought and died at Gettysburg deserve a fitting memorial for their valiant efforts, let us not forget that when the final plan is approved.

Respectfully,

C K Bebout III

Clifford K. Bebout III

## Clifford K. Bebout III

## COMMENTS

Wayne E Belt

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

RE Draft General Management Plan
and Environmental Impact Statement
August 1998

Dear Dr. Latschar:

I wish to make comment on the *Gettysburg National Military Park's General Management Plan and Environmental Impact Statement*

The authors say that . . . The mission of Gettysburg National Military Park is to preserve and protect the resources associated with the Battle of Gettysburg and the Soldier's National Cemetery, and to provide understanding of the events that occurred here, within the context of American History

.and set forth 4 mission goals I wish to address concerns and ask questions that connect to three of the mission goals; *Land and Resources, Interpretation and Visitor Experience, and Visitor Use and Facilities.*

a My major concerns are connected to the above mission goals; horse trails and horse trailer parking, trees and forest management, and boy and girl scout camping The horse and scout camping issues do not appear to have detailed plans for relocation, or budget line items. The GNP/EIS is a written document that will be accepted or rejected If details regarding these issues are not in black and white I fear for their exclusion. The trees and forest management issues appear quite prominently in the plan and are supported by budget line items. I have no fear that the trees are gone is the GNP/EIS package is adopted.

b Horse trails around the park have been available for all riders for many years. I admit that trail use may have causod problems due to erosion, but routine management before, during and after an erosion event can heal the wounds inflected by mother nature. I am a responsible trail rider I have called the GNMP for information regarding the trials and have never been denied access for any weather related problems. The horse trails should have been closed due to deep mud and wet conditions on some of those rides. I feel that erosion of the trials is a weak reason to eliminate them The concept of closing the existing horse trails is unacceptable to me I believe that if the existing trails where properly maintained the erosion issues would not exist or could be

## RESPONSES

### Wayne E. Belt

a A GMP is a framework plan that provides general guidance for park managers. Detailed plans such as you suggest are generally not included in GMPs. Where they are needed, implementation plans would be prepared prior to construction or landscape restoration.

b In the past, horse trails have been closed due to weather related concerns. The question remains as to when the trails should be closed (i.e., every time it rains, or throughout the wet seasons). The logical conclusion is to make the trails all weather. The draft GMP/EIS suggests just that, and would move the trails to historic lanes where resource damage could be more easily managed.

The draft GMP/EIS provides a framework for future decision-making and is not intended to be specific. Design decisions such as location, parking and how trails would be connected would be determined at the next planning stage.

mended before they are large problems. I belong to several trail riding clubs Each would volunteer to help maintain trails for horse use. Please involve me and those clubs in the horse trail issues that may result from the implementation of this plan.

c **Where will the new horse trails connect the historic lanes? How will the *historic lanes* connect to form a loop ride of any significant length?**

Horse trailer parking, as it appears in the GMP/EIS, is not clear. Horse trailer parking is an issue "to be worked out later " The trailer parking facilities at McMillan Woods appear to work I believe, from listening to conversations at the *workshops* that parking horse trailers with campers is "unsanitary " The sanitation issue appears to have been overlooked for several years in the existing situation at McMillan Woods. The local horse vender/camp is working with you to protect their interests Trailer parking at the local horse vendors, camp is unacceptable for two reasons The camp is isolated from the park by private land, a boundary that may change to a blockade. The camp is not big enough to handle the numbers of trailers that may use the GNMP trails

d **Where does the GNMP plan to accommodate horse trailer parking?**

Tree and forest management is another of my concerns From an environment point of view, it is wrong to cut down any trees I have talked with many reenactors who say most people can realize battle line without cutting down the tree Most visitors to the park may not be as concerned about the *view of the battle lines* as military historians.
Forest management is one thing, harvesting all the trees in an area is quite another

*There are no alternatives to harvesting the 500 + acres of trees in the GMP/EIS.* There have to be alternatives that can save those trees Many have lived along time, and with proper management can live on A tourist with a good imagination can look through the forest to see the battle.

e **Does the GNMP have any alternate plans to prevent the harvesting of 500+ acres of trees?**

The GMP/EIS proposes the elimination of scout camping at McMillan Woods. The proposed new location for the scout camp is next to the proposed visitors center. The reason for the closure of McMillan Woods is based upon evidence of Confederate camps in the area I object to moving the Scout camp to the proposed location for the following reasons. Scouts are young people full of energy and enthusiastism Young scouts can be a management problem. Isolating the scouts from the "*mall scene*" of the new visitors center is of prime importance. The purpose of visiting the GNMP is for the scouts to appreciate what went on here in 1863, not spend money in the visitor's center. They can go to a mall back home. I also contend that the scouts can form a better bond with the Civil War and its history if they are part of it in the existing isolated quarters If some scout troops are concerned about sleeping behind CSA lines, develop an isolated camp behind Federal line

c A GMP is used to set forth a basic management philosophy for a park and provide a framework for future decision-making. The draft GMP/EIS is only the first step in the planning process that would lead to a final plan for relocating the horse trails. Final locations of horse trails have not yet been determined. Site specifics are normally not determined at this stage of the process. Throughout the process, park management would involve the public to ensure a smooth transition from the old to the new. The draft GMP/EIS notes that consideration would be given to connecting historic lanes with new sections to provide for loop trails. This is discussed on page 93 of the draft GMP/EIS.

d Horse trailer parking would remain at McMillan Woods until the new trails are constructed along with new parking areas. The exact location of parking would be determined at a later date, as part of planning to develop the new horse trails.

e NPS visitor surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help the park meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff is frequently asked if the battlefield landscape looks as it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible. That is why each of the action alternatives suggests some level of vegetation removal.

## COMMENTS

f **What unwritten plans does the GNMP have for keeping the scout camping safe and isolated from the visitor's center "mall?"**

I want to close with one final observation The visitors center. The Boyle Group is constructing a "Mall" at the intersection of Route 97 and 15 It will look like just another of the malls that architects have developed to make a buck. By all appearances the GNMP Visitor's Center is going to be just another mall. My hope for the GNMP Visitor's Center, if the GMP/EIS is approved, is that its visual affect will impart feelings of the importance and history of this place Another mall will not serve to convey the significance of what happened here in three days in 1863

g **What can be done to prevent the "just another mall" architecture of the proposed GNMP Visitor's Center?**

Sincerely,

Wayne E. Belt

Wayne E Belt

## RESPONSES

f Organized youth groups use the Youth Group Campground at no charge. It serves as a base of operations for visiting the park and learning about the Battle of Gettysburg. The preferred alternative proposes relocation of the Campground to a site that is located outside the Major Battle Action Area but closer to the museum complex and key sites related to 2nd and 3rd days action than the current campground. NPS considers that this will not only remove a non-historic intrusion from a Major Battle Resource Area but also facilitate a more meaningful visit by the youth groups. This location also provides improved access from two major road corridors, Taneytown Road and State Route 97. The draft GMP/EIS states that the site would be natural in appearance, managed to preserve historic features where possible, and screened from the new museum complex.

g Actual design of the proposed museum complex would not begin until after NPS has selected an alternative, the GMP process is complete and the NPS signs a formal agreement with the Gettysburg National Battlefield Museum Foundation. At that time, in accordance with the Letter of Intent, the Foundation would be responsible for providing a design concept for "facilities that respect their location and the historic vernacular building tradition of the area; respond sympathetically to the natural landscape features of the site; and become a positive catalyst for preservation and a lever for sensitive development of surrounding areas." (Draft GMP/EIS, p. 327)

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October 29, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

I am writing to let you know that I am in favor of the new general management plan for Gettysburg National Military Park. I have visited the park with my family in the past, and we all really enjoyed it. We did the driving tour and also walked along the grounds. The historic ambiance is palpable in the air! I am a member of the NPCA and received the newsletter for October outlining your plan. I personally would like to see the movie and theatre included in this plan. I believe that it would only enhance the Gettysburg experience. If you're going to do it, do it right and all at once!

Thank you for taking the time to read this letter and I can't wait to visit the new improved park in the future.

Sincerely,

Doniella J. Berry

Doniella J. Berry
Assistant Account Manager
Preston • Osborne

PRESTON OSBORNE

Public Relations
Marketing
Opinion Research
Public Affairs
Creative Services

Doniella Berry
Assistant Account Manager

## Doniella Berry

## COMMENTS

October 15, 1998

John Latscher, Superintendent
Gettysburg Nat'l Military Park
97 Taneytown Rd.
Gettysburg, Pa. 17325

Dear Mr. Latscher:

I have been reading of the proposed new visitor center complex and improved and expanded museum facilities, and it all sounds very exciting. However, unless I missed it, I have not seen any references to the Electric Map.

a I am writing to strongly urge that the Map be retained as the tool to explain the field and the battle. My wife and I have been to more than twenty Civil war sites, and of all the video tapes, slide shows and movies that we have seen at various visitor facilities, the Electric Map is the most clear and understandable information of any event.

Last weekend I took my niece and her fiancee, who were visiting from Washington, D.C., on a tour of the battlefield. They both remarked that seeing the Map show before we went out on the battlefield greatly helped them understand the events.

So please, make a place for the Map in the new facility.

Yours truly,

Sarrisa Berry

## RESPONSES

### Sarrisa Berry

a All of the action alternatives include keeping an Electric Map in some form as a primary resource for orienting the visitors to the Battle of Gettysburg. The proposals call for upgrading and modernizing the map program to provide for more effective communication with today's audience.

Dear Superintendent John Latscher,

My name is Sharon A. Bertges. I am writing in regards to the Gettysburg development plan that should not take place. My High Point Gazette Paper gave this address to send comments from the public and can't attend any meetings. I'm not that business minded but here goes:

1. Sell a stamp or certificate of some sort to raise funds to save Gettysburg.
2. Could you get the Scouts involved at all?
3. Supermarket chains? / Raffles
4. Fundraising Dinners?
5. Years ago when the program "Dallas" was popular, they used to sell an inch of property to people who visited & gave them a certificate. (fake of course). Even if they couldn't visit, could you advertise that anywhere?

Just a thought.

Good Luck on your Battlefield front.

Sincerely,

Sharon A. Bertges

God will give you the ability, if you give him the availability.

**Sharon A. Bertges**

## COMMENTS

DONALD R. BIFFEN, D.D.S.

8/24/98

Dear Dr. Latscha,

This is to let you know I appreciate being kept up to date on the plans for GNMP and your soliciting input on their direction. My feeling after reviewing your mailing and that of Friends of Nat'l Park / Gettysburg is that you are to be commended for foresight and patience. I feel you have a good vision of the sort I'd would be, in my mind, the best direction. If funding is present Dist. Park, first Civ. Ref. Keeping the good work.

Best regards
All the best

## RESPONSES

**Donald R. Biffin**

Dear Dr. Latschar,

Please help us move forward with the General Management Plan at Gettysburg National Park. We need to protect & enhance one of our most precious National Monuments.

Sincerely,

Name Hank Birdsell

Address

**Hank Birdsell**

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>Thank you for recognizing and appreciating the Friends of the National Parks at Gettysburg. I look forward to continued good news as the General Management Plan moves forward.<br>Sincerely,<br>Name Catherine D Bishop<br>Address | Catherine D. Bishop |

## COMMENTS

**Dear Dr. Latschar,**

It is important that the General Management Plan move forward. Thank you for listening to us.

Sincerely, Rebecca Black

Name

Address

Mrs. Rebecca Black

The HSUS-Helping End Cruelty to Animals

## RESPONSES

**Rebecca Black**

## COMMENTS

**Dear Dr. Latschar,**

It is imperative that the General Management Plan for Gettysburg NMP move ahead. Please do what you can, and thanks for hearing as FNMS members.

Sincerely,

Name Steve Black (COG, Zoom Mtg)

Address

## RESPONSES

**Steve Black**

Bruce Babbitt, Secretary
Dept. of the Interior
1849 C St. N.W.
Washington, D. C. 20240

1 October 1998

Dear: Secretary Babbitt

I am writing as a concerned American, a member of the Peninsula Civil War Round Table and constituent. (PCWRT meets 3rd Tuesdays, Salvatore's, San Carlos, CA; come at 11:15)

In general, I am writing about my concern for priority of order by Congress. THE CLERKS ARE RUNNING YOUR COUNTRY. There are a large number of "grass roots" organizations that would support your efforts in the direction of preservation of Civil War historical sites, should that very desirable aim become a focus for you in this time of accumulating knee pads in government offices, mostly high, we hope. November will see a number of opportunities to stay and help solve this CLERK domination of the Government. And then some won't earn that right.

a Additionally, I (along with many others) am opposed to the funding ($ 74,000,000) to *commercialize* the Gettysburg National Military Park. The funds would serve a much better purpose if utilized to preserve endangered sites. The requests to extend the " comment period " on the General Management Plan for modifications to the GNMP seem to be totally in the hands of Supt. John A. Latchar, who seems to be oriented in the direction of self-gratification. ACTUALLY, IT'S A REAL EXAMPLE OF CLERKS RUNNING THE COUNTRY. This gentleman toured California this summer at our expense, heard none of our concerns and went home saying " those stupid bastards who love the country can just TRY and read 400 pages in 60 days and defeat my plan, hehh! hehh! hehh! "

It is my understanding that David Bama, NPS, stated that any decision to extend this evaluation period would be the sole discretion of Supt. Latschar and not by anyone in Washington. This is a blatant disregard for the public and a classic example of "putting the fox in charge of the henhouse." Actually, it's a *demand* that NPS first censure, then fire Clerk Latschar. He had his chance to hear us and he went home snickering. One has to wonder where the payoff is. We don't want commercialization in the Park, and we hate that damned erection that's still there! These guys won't hear the public – will they hear *you*? Will you hear us? Five weeks.

Your consideration and cooperation would be greatly appreciated. The probability of sacrifice of the programmmed funds in TEA-21 falling through the Monica crack, or doing so yesterday with the year end, really concerns me and should concern the entire country. Did it make your agenda?

Sincerely,

T. R. Blair

cc: Mr Jerry Russell, Heritagepac
Mr. Ruff Fant, The Civil War Trust
Mr. Steve Sylvia, NST Civil War

## T. R. Blair

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

# COMMENTS

Author: "Margaret D. Blough" at NP--INTERNET
Date: 10/15/98 1:24 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: Katie Lawhon at NP-GETT
Subject: Comments on Draft GMP/EIS
---------- Message Contents --

Dear Superintendent Latschar:

I am a member of the First Corps of the Friends of the National Parks at Gettysburg , APCWS, and GHAF. I participate in the Gettysburg Discussion Group and the CompuServe Civil War Forum. I belong to the Camp Curtin Historical Society /Civil War Round Table, and the Harrisburg, Pa, Bull Run (Manassas, VA), and White Rose (York, PA) Civil War Round Tables. I belong to the Longstreet Society and have been actively involved in the Longstreet Memorial Fund. I have participated in several adopt-a-position groups, including one for the 20th Maine.

I have reviewed the draft " General Management Plan /Environmental Impact Statement" ("GMP/EIS"), the consultants' reports, the NPS Director's response to the protests filed by the Monahan Group and the Gettysburg Battlefield Coalition, and the handouts at the meetings and the mailings to those on the mailing list. In addition, I have attended many of the NPS public workshops, advisory Committee meetings, and the October 1, 1998 public hearing, at which I was one of those who spoke on the record. I fully support the National Park Service ( NPS")'s proposed plan , Alternative C

Alternative C balances the realities of managing an extremely popular national park, respect for the commemorative functions of the Gettysburg National Military Park (" GNMP"), and restoration of major viewsheds and other features in the GNMP in a way that will enable visitors to better appreciate how the battle occurred and how the terrain affected it as well as restoring the CW section of the Soldiers National Cemetery To the extent that it is financially possible and consistent with the commemorative purposes and reasonable visitor needs, I would like to see as much of the GNMP as possible restored to the state it was in in 1863 (pasture, woodlot, farmland, orchards, etc ).

Alternative D sounds attractive, but it does appear to be the most expensive and some aspects (such as removing some of the tourist rest room facilities) would fail to meet legitimate visitor needs.

I was impressed by the concern expressed throughout the draft GMP/EIS for the impact of decisions regarding the GNMP on the surrounding communities and the desire to do more, in cooperation with local authorities, to include the historic areas of Gettysburg in the interpretation of the battlefield.

I believe that Alternative C, the proposed plan, presents the best framework for the future management of the GNMP , within the options available to the NPS. Obviously, we all would wish that adequate public funding for the NPS in general, the GNMP operational needs, and a new Visitors Center ( VC")/Museum were one of those options. However, crucial senators and representatives have made it clear that there will not be any public funding for the construction of a new VC/Museum, either now or in the foreseeable future.

The public-private partnership with the non-profit corporation arising out of the Kinsley proposal to build the new VC/Museum is the best of the available options for bringing this critically needed facility into existence The income producing features retained after negotiations, including the Foundation activities, are fully site-related and will enhance both the visitors' educational needs and their physical needs. The mixture of fundraising and financing set forth for the VC/Museum in the draft GMP/EIS provides the maximum flexibility. While I am not one of those who opposed a reasonable parking fee, I also did not want fees charged that would place VC/Museum services financially out of the reach of many, especially families and those on limited incomes. Visitors who do not want to pay or cannot afford the fee charging activities still have access to a wide range of information and experiences.

# RESPONSES

## Margaret D. Blough

I do hope that shuttle services, particularly to the high visitation area and the historic distance, are put into place as quickly as possible.

The plans for the VC/Museum not only provide for state of the art facilities for the preservation of the artifact and document collections, but will finally provide the space for the kind of education, interpretation and display that will not only tell the military story of the Battle of Gettysburg but also the impact on the town and its inhabitants and place the battle in context in terms the military, political, and social aspects of the Civil War. It will also provide for the proper exhibition of the Cyclorama painting. I have reviewed the Foner/Silber/McPherson report. The possibilities for the museum are very exciting. Gettysburg is the first Civil War park that many people visit. A positive first experience can produce a lifelong interest in the Civil War in people of all ages. Even for those who do not care to get involved in depth, it can produce understanding of the need for and support of historic preservation activities. In addition, it will finally provide the facilities needed to bring the library and the collections together where the collections can be archived and curated in a way that makes them far more accessible to researchers The draft GMP/EIS is, in my opinion, well-suited to create and maintain an environment where visitors ranging from total newcomers through serious historians (both professional and amateur) can have a positive experience that enables them to appreciate what happened there and what the veterans wanted to commemorate. I think that anything that enhances visitors' experience will benefit the community, including those businesses that serve the visitors. As the Harrisburg Patriot-News pointed out in its excellent editorial supporting the proposed plan:

". . . . Somebody had to offer a way out of the battlefield's long-term downward
spiral in the absence of Congress providing the necessary resources That
somebody is [GNMP Superintendent] Latschar, and everyone who cares about
Gettysburg would do well to lend him their support in this vital effort of preservation and visitor enhancement.

This may be the only chance we get in this generation to ensure that the scene
of the most important battle in American history remains a site that reflects the
respect and honor that is due it, while at the same time serving as an invaluable
teaching tool about the American struggle to become one country and one people

It is in the interest of both the nation and the local community that this singular
opportunity to change the deteriorating course of this greatest of America's military
shrines move forward, that it not fall victim to further delay and indecision "

The location of the VC/Museum on the LeVan tract brings a parcel, currently privately owned but within GNMP boundaries, into the GNMP in a meaningful sense and the use of it and the
Fantasyland site for other park related purposes will allow facilities currently on the High Water Mark/Zeigler's Grove site to be moved to land on which no major battle action occurred. I highly
approve of the plans to restore the High Water Mark/Zeigler's Grove area by removing the modern structures and parking lots.

The documentation and depth of research involved in the draft GMP/EIS is impressive, as is the
cooperation and responsiveness of Dr. Latschar and his staff The draft GMP/EIS is one of the most readable and comprehensible documents I have read in a career which involves a great deal of reading of public documents. I do not believe that time is on our side and that the proposed plan is our best chance of honoring the trust put in us by the veterans and passing it on to future generations.

Sincerely,

Margaret D Slough

# COMMENTS

Author: "Margaret D. Blough" <102505.271@compuserve.com> at NP--INTERNET
Date: 9/25/98 2:45 PM
TO: Katie Lawhon at NP-GETT
TO: Laurie Blakeslee <74644.2204@compuserve.com> at NP--INTERNET
TO: "Terry Burger" <tburger@sun-link.com> at NP--INTERNET
TO: "Earl J. Coates" <pasha2@erols.com> at NP--INTERNET
TO: Lorne Colmar <106142.2324@compuserve.com> at NP--INTERNET
TO: Paula Gidjunis <paulag@compuserve.com> at NP--INTERNET
TO: Maripat Grams <grams@harford.lib.md.us> at NP--INTERNET
TO: "Paul Kenworthy (SA)" <paulkenworthy@compuserve.com> at NP--INTERNET
TO: Jack Lawrence <JLawr15139@aol.com> at NP--INTERNET
TO: "Don Robertson (Sec Ldr)" <72123.1512@compuserve.com> at NP--INTERNET
TO: "RAY MAGNETTI , Sr." <103304.2275@compuserve.com> at NP--INTERNET
TO: "Stevan F. Meserve" <75361.755@compuserve.com> at NP--INTERNET
TO: Dan Morrow <70754.334@compuserve.com> at NP--INTERNET
TO: Dan Paterson <dpaterson@bnflinc.com> at NP--INTERNET
TO: "Brian C. Pohanka" <102215.274@compuserve.com> at NP--INTERNET
TO: Phil Spaugy <pspaugy@compuserve.com> at NP--INTERNET
TO: "Rep. Harry Readshaw" <Readshaw@aol.com> at NP--INTERNET
TO: Anna Sulewski <asulewski@hersheys.com> at NP--INTERNET
TO: "Jack C. Thomas" <treddhedd@msn.com> at NP--INTERNET
TO: Susan Thomas <thomas@ils.unc.edu> at NP--INTERNET
TO: Wayne Wachsmuth <102353.732@compuserve.com> at NP--INTERNET
TO: "David Woodbury (SysOp)" <76710.261@compuserve.com> at NP--INTERNET
Subject: Copy of: Letter to Dept. of Interior re: Gettysburg NMP
---------- Message Contents --------- --

-- ------- Forwarded Message ---------

From: Margaret D. Blough, 102505,271
TO: Sen. James M. Jeffords, INTERNET:vermont@jeffords.senate.gov
Sen. Trent Lott, INTERNET:senatorlott@lott.senate.gov
Sen Robert D. Torricelli,
INTERNET:senator_torricelli@torricelli.senate.gov
CC: Sen. Rick Santorum, INTERNET:senator@santorum.senate.gov
Barbara Turner, INTERNET:barbara_turner@lott.senate.gov
DATE: 9/25/98 2:17 PM

RE: Copy of: Letter to Dept. of Interior re: Gettysburg NMP

Dear Senators Lott, Jeffords, and Torricelli,

I am attaching a letter from Jack Lawrence of the Gettysburg Discussion Group to Ms. Turner of Senate Majority Leader Lott's staff. I join in the questions he asks and the statements he makes, including the invitation to come and see the conditions at GNMP yourselves.

It deeply disturbs me that you should take such drastic action based on such outdated and/or inaccurate information as set forth in the newspaper articles about your joint letter to Secretary of the Interior Babbitt..

In stating that a majority of CW organizations oppose it, which organizations are you including and are you going by the number of organizations or the size of the membership?.

I am a member of the First Corps of the Friends of the National

# RESPONSES

## Margaret D. Blough

Parks at Gettysburg (FNPG , 10,000+ members strong (there are also approximately 8,000 supporters), which came out in favor of the proposal selected for negotiation, after polling its membership which overwhelmingly supported the proposal selected for negotiation.. Members participating in the poll (29% of the membership, an extraordinarily high participation rate) expressed concerns about what would be in the ultimate agreement, which, in my personal opinion, have been overwhelmingly satisfied in the subsequent negotiations. I am also a member of the APCWS which came out in opposition to the proposal without making any attempt to ascertain the opinion of its membership. Dennis Frye, then President of the APCWS, made it clear in his testimony before the senate subcommitte overseeing the NPS, that, while he discounted the need for the park, his primary opposition was based on not wanting Gettysburg NMP to be competing with APCWS for charitable donations. APCWS is currently trying to pay off its massive investment.
in purchasing the Brandy Station battlefield.

The FNPG as well as representatives of the 500,000 member National Parks and Conservation Association and the National Trust for Historic Preservation and Sen. Rick Santorum (R-PA) and Denis Galvin of the NPS testified on February 24, 1998, in favor of the proposal at an Oversight Hearing regarding the proposed VC/Museum of the Senate Committee on Energy's Subcommittee on National Parks, Historic Preservation and Recreation. The FNPG representative referenced the concerns expressed by the membership and both other organizations also expressed concerns they wanted addressed in the negotiations regarding the Kinsley proposal. I believe that a review of the statements from those organizations will indicate how thoroughly the NPS addressed those concerns. APCWS, the Gettysburg Battlefield Preservation Association, and a representative of an unsuccesful submitter of a proposal in response to the Request for Proposal also testified.

The LeVan site is technically within park boundaries, but it is currently privately owned and so is subject to changes compatible with local zoning laws at any times unless it is acquired for the use of the GNMP,. In March 1998, an independent panel of nationally recognized historians verified the NPS/GNMP historians' methodolcgy and the conclusions which they had reached earlier that, except for artillery positions, which will be protected, on the fringes of the LeVan site, the LeVan property was a staging area and artillery park on which no significant battle action occurred. Archaeological studies have occurred on the site. It was hardly an undisturbed site to begin with. In addition, currently, it is not open to battlefield visitors since it is not open to the public. Moving the Visitors Center and new museum to the LeVan site will enable the park service to restore the view plane of Zeigler's Grove and the High Water mark on which some of the bitterest fighting and the highest casualties occurred. Some opponents minimize what this would mean, arguing that the archaeoligical significance of the site has been irreparably destroyed However, many other anachronistic post battle structures have been acquired by and removed by the NPS over the years enabling visitors to far better appreciate the lines of sight and terrain that had such critical effects on battle action in the GNMP. As it is, anyone trying to view the Pickett's Charge area from the Cemetery Hill/East Cemetery Hill/National Cemetery area must contend with the current VC and its parking lot. Anyone looking at the High Water Mark from the Confederate lines must deal with the anachronistic intrusion of the Cyclorama Building. If you have not yet read the independent historians' report yet, please do.

I have been at nearly all of the public meetings sponsored by the NPS in the last year. I have reviewed the materials issued by it regarding this matter, and have followed the press coverage as well. The vocal opposition of some local businesses to the proposal is led by a handful of

## COMMENTS

merchants who located businesses on Steinwehr Avenue and Baltimore Street in order to take advantage of the tourism generated by the VC when it moved into its present location. They have made it very clear that they feel that they have a right to have their current favorable location and their existing profit margins guaranteed at taxpayer expense. In order to do that, they oppose even so much as a thirsty, hungry, and tired tourist being able to get something cold to drink and/or a snack without leaving the visitors center. The draft GMP makes it very clear the NPS's commitment to increasing partnership with the Borough of Gettysburg and surrounding municipalities. The NPS director's response to the protest of the Monahan group, whose proposal was not chosen, made it clear that one of the major reasons that it was not chosen was that it would locate the new facility miles away from the battlefield and downtown as part of an extensive "heritage campus" which would include hotels, restauraunts and shops. This would have necessitated bus or car travel to the battlefied through the most commercially developed and most congested highway into Gettysburg, reducing visitation to the battlefield and having a devastating impact on all of the business of the historic district in Gettysburg. The Gettysburg Battlefield coaltion, another unsuccessful submitter, listed the LeVan site as a possible location as well as the Kinsley proposal.

The new facility will finally allow for not only the proper storage of fragile and irreplaceable documents and artifacts but it will provide the room and facilities, not currently possible in the grossly inadequate space available, for the document and archive collections to be properly curated and open to scholarly study, not just by academics but by other citizens doing research, including on their forebears. It will also offer a greatly enhanced ability to display the collections and use them to interpret not only the battle action of Gettysburg but to allow visitors, including newcomers to the subject of the Civil War, to understand the context of the battle, militarily and politically, in the context of the Civil War in general and the time period. It will also enable the GNMP to be able to bring in documents and archives regarding Gettysburg donated to other NPS sites whose mission is unrelated to Gettysburg and give them a proper home.

You have acknowledged the need for this facility in your letter. If it is not built on the LeVan or adjoining Fantasyland sites, then it will have to be built at a much greater distance from the park. The current site is a critical battlefield area and should be rescued. The Cyclorama building is deteriorating badly. More bandaids on the current VC will, in my opinion, do little good. If you object to a non-profit corporation (which will be the partner; =not= the Kinsley Group, per se.) and the concept of a public-private partnership, then the answer is in your hands: adequate federal funding for the new visitors center/museum. If you cannot or will not do that, please do not permit yourselves to be used to derail this project. The maintenance of the status quo advocated by many opponents would be a road to disaster.

The process of arriving at the current plan has included extensive public involvement and a high degree of responsiveness of NPS officials, especially Dr. Latschar, the Superintendent of the GNMP, to concerns expressed by those who supported, opposed, or were undecided about the Kinsley proposal. This responsiveness is amply demonstrated in the changes made in the initial proposal during negotiations. Changes were made promptly and ungrudgingly where appropriate. It was not a matter of surrender to a firestorm of criticisms. I regret that there are opponents who will label anything short of getting absolutely everything they want as unresponsiveness.

As Mr. Lawrence stated, your interest in the GNMP is important and appreciated. Please give this matter further consideration and please

## RESPONSES

consult with Senator Santorum who has immersed himself in the subject and who has been of immeasurable help to the GBMP.

Sincerely yours,

Margaret D. Blough
4200D Society Park Court
Harrisburg, PA 17100-4931
(717) 652-6733
E-mail: 102505.271@CompuServe.com

*-----Original Message-----
*From: owner-gettysburg@gdg.org [mailto:owner-gettysburg@gdg.org]On
*Behalf Of JLawr15139@aol.com
*Sent: Thursday, September 24, 1998 5:44 PM
*To: barbara_turner@lott.senate.gov
*Cc: gettysburg@gdg.org; FNG@mail.cvr.netnps.gov/gett/access
*Subject: Gottysgurg in USA Today
*
*
*Buteemed member JLawr15139@aol.com contributes:
*
*Dear Ms. Turner,
*
*I am attaching to the message a copy of a recent artice in U.S.A. today. This *article has elicited a fair amount of comment in certain quarters, and I am looking for some clarification.
*
*First,
*
*What was the origin of the statement this proposed site was the "last" undisturbed site on the Battlefield. This is palpably untrue, and it appears that Senatot Lott has been mislead in this matter. Who told him this ?
*
*Second,
*
*What are the objections of the merchants and who are they ?
*
*Three,
*
*Who are the specific *overwhelming Majority of Civil war Organizations* ?
*
*Four
*
*Senator lott, of course, is a very influential person. Will there be any *retribution taken against the Park service if the plans go ahead as now *proposed ?
*
*Five
*
*What are Senator Lott's proposals here if he finds the present plans *deficient.
*
*Six
*
*We all appreciate Senator Lott's concern in this matter. Frankly, we wish that more people like him would care. I would respectfuly reccomend that, though we all welcome his involvement in Gettysburg and hope to see more of it the future, he might also want to take a look at the woeful condition of some of the monuments at Vicksburg, a key battlesite and a significant part

| COMMENTS | RESPONSES |
| --- | --- |
| of our<br>*heritage. especially, t... Illinois monument.<br>*<br>Finally, We would welcome Senatot Lott at the Gettysburg battlefield at any time. The *Friends of the National Park at Gettysburg is having a muster there on 10/17 that he would find informative. I cannot speak for them, but i am sure they *would have no objection I personally would welcome him as a guest (and pay his fee.) Frankly, we need more people at his level taking an interst in our<br>*heritage.<br>*<br>*Regards,<br>*Jack Lawrence<br>*<br>*<br>*PS. I promise that any response you might see fit to send will be disseminated to the 700 plus people who will see this. | |

*Law Offices of*
William H. Boettcher

August 24, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

Please be advised that I am in full support of the negotiations with the National Park Service and urge that these negotiations move forward as swiftly as possible.

a I do not support any extreme commercialism in the project and am opposed to parking fees. I also believe that the National Park Service should be the final word on the project.

Thank you for your consideration.

Very truly yours,

William H. Boettcher

WHB/lkh

S:\BOETTCHER\LATSCHRA.LTR

## William H. Boettcher

a The revised proposal for the museum complex eliminated parking fees. This was discussed on page 25 of the draft GMP/EIS.

## Gabor S. Boritt

GETTYSBURG

Gabor S. Boritt
Robert C. Fluhrer Professor
of Civil War Studies
Director, Civil War Institute
Gettysburg, Pennsylvania 17325-1486

Campus Box 435
E-Mail: gboritt@gettysburg.edu

Tel. (717) 337-6590
Fax (717) 337-6596

Gettysburg College

December 10, 1998

Mr. Robert G. Stanton
Director
National Park Service
1849 C Street NW
Washington, DC 20240

Dear Mr. Stanton:

Academic life has an unforgiving rhythm. But now that the semester is over, I'm taking the liberty of writing to you to express my strong support for the Gettysburg National Park's General Management Plan and the Visitor's Center Museum Proposal.

Among my colleagues—trained professional historians—I have heard little that was not strongly supportive of the proposal, from the dean of Civil War scholars (Pulitzer Prize and Lincoln Prize winner James M. McPherson)on down.

I myself am especially enthusiastic about the prospect of a new, modern museum that would appeal to the diverse elements of American society, particularly the young. I have three special pleadings of my own. First, much of the world associates Gettysburg with the name of Abraham Lincoln, and I would like to make sure he will be accorded appropriate attention. Second, I hope the common soldier will be fully recognized. Third, as the civilian story is told, I hope to make sure that Gettysburg will be recognized as an important part of the underground railroad. (As it happens, I live in a house that was reputed to have been a part of the freedom road.)

Like others, I may have special hopes, but I wish to emphasize that the new museum should be built. If not now, when; or ever—in the foreseeable future?

I will also take this opportunity to congratulate the Park Service for bringing a trained historian with vision and courage, John Latschar, to head the Gettysburg National Military Park.

I understand the opposition of some of the local merchants, and I sympathize with them and hope that they, too, will prosper in the new situation. But Gettysburg, ultimately, belongs to the nation. It is the place that symbolizes saving the free Union and making possible the great and, on the whole, beneficial American role in the world today.

I had the pleasure of meeting you a couple of years ago, on November 19 on the anniversary of the Gettysburg Address, when you were the guest of the Lincoln Fellowship. I do hope to see you again in Gettysburg.

Thank you for your consideration.

Sincerely,

Gabor S. Boritt

P.S. Though I have various official positions, ranging from the directing the CWI, being the program chair of the Lincoln Fellowship, and being the chair of the $50,000 annual Lincoln Prize, this is a private letter.

cc. Hon. Rick Santorum
Marie Rust
✓John Latschar

| COMMENTS | RESPONSES |
| --- | --- |
| Superintendant Latschar,<br>I strongly oppose<br>the Kinsley Plan as<br>well as any plan which<br>includes cutting down<br>trees and changing<br>the present nature<br>environs.<br>Margaret M. Borock | **Margaret M. Borock** |

9/28/98

Dear Dr. Latschar,

a Please be careful in plans for the new visitor center at Gettysburg. Don't let private enterprise take-over this park!

Sincerely,

Name Bill Bozic

Address Mr & Mrs William J Bozic Jr



## William J. Bozic, Jr.

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

August 22, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Sir,

In view of the existence of both a current Visitor Center and Cyclorama Center to preserve cultural resources, and the continued policy of case-by-case response to visitor use and resource management issues - combined with the dire need for additional funding at such National Parks and monuments as Grand Canyon and Chaco Canyon - it would appear frivolous to pursue alternatives beyond available funding from the Foundation.

Sincerely,

Sally D. Braman

Sally D. Braman
a concerned citizen

## RESPONSES

**Sally D. Braman**

Dear Dr. Latschar,

I believe it to be very important to move along with the General Management Plan. as a member of Friends of The NAT. Parks at Gettysburg, thanks for listening.

Sincerely,

Name Lee Van Brederode

Address

Lee Van Brederode

## COMMENTS

October 6, 1998

Supt. John Latschar
Gettysburg National Miliary Park
97 Taneytown Rd.
Gettysburg, PA 17325

Dear Sir:

Subject: Gettysburg Master Plan

I am writing to support the continued availability of horse trails in Gettysburg National Military Park.

Local horse groups, particularly the Gettysburg Equestrian Historial Society (I am a member), stand ready to support trail maintenance and expansion. Horses have been a fixture at the park for many years and we hope to see that use continued.

Please contact me if you require further information or input.

Very truly yours,

Janet Breeding

Janet Breeding

jb

## RESPONSES

**Janet Breeding**

Dear Dr. Laschar,

Please move along the Museum Complex at Gettysburg PA

Sincerely,

Name Barry Brekford

Address

Barry Brekford

## COMMENTS

~~To:~~ Sept 22 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa 17325

Dear John;

I am very thankful as a member of the "Friends of the National Parks at Gettysburg," that I have been given the opportunity to voice my opinion on the Gettysburg Parks General Management Plan.

From what I saw and heard at the Public Meeting on Sept. 24, 1998 at the Gettys Tre Marriott, I am very satisfied that this is the greatest event that could happen to the Gettysburg National Military Park.

I think we must embrace this project and go forward as soon as possible. This would be a great thing for the Gettysburg battlefield, and great for the history and heritage of the State of Pennsylvania.

Dr Latschar, I am very much in favor of Alternative C, and I pray the project will go forward with much haste.

## RESPONSES

**Kenneth S. Bridgen**

I will be in Gettysburg the week of Oct 5th.
I hope somehow I will run on to you to have a little chat.
I appreciate all that you are doing for the Gettysburg National Military Park. Please keep up the good work and may God bless all your endeavors.

Respectfully Yours
Kenneth J. Bridgin

Individual

## COMMENTS

Author: Lesley Bridges at NP--INTERNET
Date: 10/10/98 9:56 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Update the Visitor Center!
---------- Message Contents

Mr. Latschar,
Hello! My name is Lesley and I am a freshman at the University of Missouri-Columbia. I am writing to tell you I am very pleased you have decided to make improvements on the existing Gettysburg Historical Site. I am now doing a speech on the battle, but I visited Gettysburg this summer with my family on our vacation. We enjoyed ourselves and were deeply moved by the awesome experience of seeing this national landmark. I am writing to tell you to keep up the good work and I would like to suggest updating the visitor center as well as the center where the Gettysburg Cyclorama is kept. Although educational, these facilities are pretty run down and this detracts from the importance of these facilities. Once again, keep up the good work and thanks for your time!
Sincerely,
Lesley S. Bridges

## RESPONSES

### Lesley S. Bridges

Dear Dr. Latschar,

It's important that the general Management Plan move forward. Someday I hope to afford to make a trip to gettysburg with my family. Help Save our national heritage - Lest we forget.

Sincerely,

Name Doug Bright

Address

**Doug Bright**

## Ross Brightwell

ROSS BRIGHTWELL

Ideas & Action

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
Gettysburg, Penna. 17325

August 27, 1998

Dear Dr. Latschar,

I received a copy of the DRAFT GENERAL MANAGEMENT PLAN. I appreciated the response to my inquiry by your staff. Because I have been involved with the recent planning for the changes at the Independence Hall area in Philadelphia I am also interested in the process involved here. My comments are as follows:

1. I fully agree with and emphasize the importance of making the changes in the agriculture layout of the Park. It is impossible to comprehend the situation at Little Round Top when you cannot see Devil's Den and vice versa. The same goes for fence lines.

2. Moving the Tourist Center seems correct. I would ask:

a. Maintain/upgrade the Electric Map (which, as a fifty year old man, I consider historical in itself). This type of topographic map is essential for telling the story, especially to first timers. As a former Army officer who gave briefings on a regular basis at all levels I cannot emphasize enough the importance of an orientation on this type of map. Slides, movies and diagrams are just not acceptable for this particular purpose.

b. Reinstate the IMAX movie. I believe that a building sunk into the ground would be unobtrusive. Gettysburg deserves the ultimate telling of its story. My experience with the short IMAX presentation "Philadelphia Anthem" at Philadelphia's Franklin Institute convinces me that this format would be perfect at Gettysburg.

3. Upgrading the Parks relationship with the town is commendable. I would try to work out a compromise wherein the tourist attractions ie. wax museums, Lincoln's train, souvenirs stands, etc. which exist between the older part of town and the Park somehow be upgraded, changed or moved so as a more historically accurate rendition of the relationship between the town and the battlefield be presented. Because I move large groups of people I receive correspondence from the gentleman that owns many of these museums. I would challenge his company and other businesses to work harder to resolve this problem.

Thank you.

Sincerely,

## Lucinda L. Bringman

October 16,1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar,

I am writing to express my support for the General Management Plan of the Gettysburg National Military Park. The proposed Visitor's center seems to me to be the best solution to the problem of the current cramped space and the lack of proper facilities to care for the collection. I do not believe that the US Congress will provide the needed funds to solve that problem and therefore the private/public partnership proposed by the plan is a sound idea. Further, I think that moving the center to the suggested site would not cause the types of difficulties that so many in our community proclaim so loudly. I also advocate the planned removal of the current visitor's center and Cyclorama buildings and restoration of those areas to their appearance at the time of the battle.

I am dismayed at the discord coming from the community and am especially concerned that it will further delay action for the Park. I imagine that the residents of Adams county must seem small minded to many of those outside the area who have engaged in this debate, since the arguments seem to focus so much on the preference for no change in the current situation. The vitriol directed especially at you and your office has been uncalled for and unreasonable. You have been doing an excellent job in this very difficult task and I certainly hope you will see the plan to fruition. I felt compelled to express my views in order to counter the notion that all the local residents are against this plan. (I even support the deer management the Park has used.)

Respectfully yours,

Lucinda L. Bringman

Lucinda L. Bringman

Cc Arlen Specter
Rick Santorum
William F. Goodling

## COMMENTS

RUSSELL K. BROMAN, ESQUIRE

October 13, 1998

Dear Superintendent Latschar

As the volunteer coordinator for the Western Pennsylvania Civil War Round Table's Adopt-A-Position I attended the recent public meeting in Pittsburgh regarding the proposed General Management Plan. I am in favor of Plan C, especially in your long term goal of restoring the battlefield to its condition at the time of the battle. We are responsible for the 1st Vermont area and have been interested in helping aid to at least thin the area out to reflect its battlefield condition which should aid in understanding the action better than is presently possible We would hope that under Plan C we will be involved in helping to remove the woods in this area and would appreciate involvement with the planning stages Plan C should incorporate the volunteers in the proposed means of effectuating of the Plan

a One area in which I have a minor disagreement is with your proposed moratorium on additional monuments for the time period covered by the Plan. While I share the concern of too many monuments being added, to absolutely bar the addition of any new monuments seems to be throwing the baby out with the bathwater. Under this approach the recent addition of the Longstreet monument would be impossible for the next forty years. Instead, strict limits should be placed on the addition of new monuments; perhaps by the establishment of standards and an independent review board with ultimate veto power by the Park Superintendent. While this is not the only manner to severely restrict the addition of new and unnecessary monuments, something

## RESPONSES

### Russell K. Broman

a The moratorium on new monumentation is being imposed as a means to preserve the historic integrity of the park's nationally significant battlefield and commemorative landscapes, both of which are intimately associated with the soldiers who fought at Gettysburg. The increasing addition of contemporary memorials detracts from the Government- and veteran-built monuments and the historic battlefield. The incremental accrual of these new commemorative devices inevitably changes the park that was first envisioned and created by the Gettysburg battle veteran.

along these lines would be preferable to a complete ban. You mentioned that politically powerful groups can presently push through a monument that perhaps is not recognized in its overall value to the battle and the park. The proposed moratorium, however, will not ban the addition of such a monument if the group advocating it has that much influence. This is why a structure to make it difficult with built in standards and checks and balances would seem to be the preferable manner of addressing the problem.

Again, as volunteers, we look forward to the adoption of Plan C and our hopefully better explained role in its execution.

Sincerely,

Russell K. Broman, Esquire

## COMMENTS

Author: "Brown; Carol G" at NP--INTERNET
Date: 10/14/98 9:45 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject General Management Plan and Environmental Statement
---------- Message Contents -

UNITED STATES DEPARTMENT of the INTERIOR
National Park Service
Gettysburg National Military Park

Attention: Dr. John Latschar

Dr. Latschar,

I do not know if you are personally reading our letters of protest regarding the GMP draft
However I am as a resident of Gettysburg feel compelled to voice my sincere concern and
disapproval of all the alternatives as published.
I stronglY feel that improvements are necessary and that the condition of the Visitor Center in
its current condition is heart breaking. It is in obvious need of extensive restoration and in dire
need of modern or updated environmental control systems as well as a large dose of TLC. How-
ever we do not destroy and rebuild our aging and Historical buildings simply because we no longer
want to be bothered with maintaining them. In past years many people have truly enjoyed the
Visitor Center and all it has to offer, but this year is the first time I have overheard people commenting on the odor and lack of interest of the park employees at the center.
I was very disappointed on a recent trip to the Visitor Center with out of town guests to observe the
obvious deterioration in every aspect. This is something I had not experienced in the past.
I am also very concerned about the idea of moving the Cyclorama as I fear for the damage that may occur to this wonderful artwork. Lousing this would be a great loss to the world, not just the Parks.
It also is a great tragedy in my opinion to remove even one healthy TREE anywhere on the existing
Battlefields when we live every day in a country which is increasingly concerned with pollution of the very AIR we breathe and the WATER we drink as well as the soil in which we raise crops to feed an
ever increasing population.
I would like to know how you can with a clear conscious justify the increase in pollution these actions
will bring on the population of our community?
When was the last time you actually went for a long walk through any area of the Gettysburg Battlefields? I do walk in the Park on a regular basis, I cannot explain the emotions I feel when I walk, but I can tell you I have never had a problem imagining what must have gone on there nor do I
feel any less reverent when I stop to pay my respects to the men, women and children who were directly effected by the "Battle of Gettysburg" not to mention the rest of the world.
I wish also that you would consider the positive effect that the use of "Birth Control" used in other
States for controlling the "DEER POPULATION," rather than any more BRUTAL SLOTTERING
of our miniscual herd now living in the park. I find it difficult to believe these beautiful animals are
causing more damage than the human visitors do.

In an effort to keep this to a minimum I will only say I feel certain there is a more practical and clearly a more cost effective approach to satisfy the needs of The National Parks . The Good Citizens of our community and continue to make the Gettysburg experience as appealing to the Tourist as it has always been without KILLING TREES, ANIMALS OR CREATING POLUTION AND ERROSION OF THE RESOURCES AND MEMORIALS WE ALL LOVE AND ENJOY now and for FUTURE GENERATIONS.

## RESPONSES

### Carol G. Brown

Subject: Comercilization of Gettysburg
Author: DBrown
Date: 10/4/98 5:01 PM

a I just became aware of the subject under consideration.
The only sector that will benefit from the plans underfoot to allow comercial development at "this hallowed ground" is the developer/operators and prehaps some spinoff to the the local area(RV parks,gas stations, laundromats, etc---all new now that the battlefied is a civilized area to visit).

Please include this message as a "No" vote against the proposal!

DEB

## D. E. Brown

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

| COMMENTS | RESPONSES |
| --- | --- |
| COMMENTS ON<br>DRAFT<br>GENERAL MANAGEMENT PLAN<br>AND<br>ENVIRONMENTAL IMPACT STATEMENT<br>OF<br>AUGUST 1998<br><br>BY<br><br>DONALD AND GLORIA BROWN | **Donald and Gloria Brown** |

COMMENTS ON G.M.P. & E.I.S.-GETTYSBURG NATIONAL[1] MILITARY PARK-AUGUST 1998

| PG | OTHER | |
|---|---|---|
| IV | B | OPPOSE SHUTTLE USE AS ALTERNATIVE TO CARS. |
| IV | C | OPPOSE REHABILITATION OF LARGE SCALE LANDSCAPE ELEMENTS PRESENT DURING BATTLE |
| IV | C | OPPOSE ADDING OR SUBTRACTING OF WOODLOTS, FENCES, TREES, ORCHARDS AND OTHER FEATURES PRESENT DURING BATTLE. |
| IV | C | AGREE WITH RELOCATION OF PARK OFFICES TO EMMITSBURG AREA-ALSO EXTRA PARKING AREA, MAINLY FOR BUSES |
| IV | D | OPPOSE ACTIONS TO "MAXIMIZE VISITOR USE", SINCE I ASSUME IT REFERS TO USE OF SHUTTLE BUSES AND A SHORTENED TOUR. |
| IV | E | OPPOSE ELIMINATING MAYSLE EXHIBITS. I THINK THEY ARE A KEY TO EXPANDING UNDERSTANDING WHAT TOOK PLACE ON THE BATTLEFIELD. |
| V | C | VISITORS WOULD RECEIVE IMPROVED ORIENTATION AND INFORMATION ON USE AND UNDERSTANDING OF PARK. WHY IS THIS NOT BEING DONE NOW? (AS, FOLLOWING MONEY AT SOME THING IS NOT IMPROVING IT) |
| VI | C | IF VISITORS ARE INTERESTED IN SPECIFIC INDIVIDUAL SOLDIERS PRESENT AT THE BATTLE, THEY SHOULD REFER TO THE ARCHIVES. |
| XXI | FRONT MATTER | THE INTENT TO LEAVE THE BATTLEFIELD JUST AS IT WAS WOULD PRESENT A SORRY SIGHT TODAY. THERE WOULD BE MANY ENTIRE REGIMENTS, DEAD HORSES, WANDERING SOLDIERS, DESTROYED FENCING, BURNED BUILDINGS, AND LITTLE LIVESTOCK OR CROPS. |
| XXV | " | PROVIDING FOR VISITOR SERVICES WAS OF FIRST IMPORTANCE TO NPS. EVEN BACK IN THE 1930'S, THEY REALIZED THAT RESTROOM FACILITIES WERE NEEDED ALONG THE |

## COMMENTS

XIV CONT. BATTLEFIELD ROADS, ESPECIALLY [redacted] WITH SMALL CHILDREN AND BY OLDER PEOPLE.

| PG. | MHAR | |
|---|---|---|
| 14 | 1.6.2 | INTERPRETATION HAS BEEN JOB OF NPS ALL ALONG. WHAT HAVE THEY BEEN DOING? |
| 15 | 1.6.3 | PEOPLE WANT TO SEE AND EXPERIENCE THE PARK - CREATE WALKWAYS TO MONUMENTS, AS NECESSARY |
| 15 | 1.6.3 | CREATE MORE OFF-ROAD PARKING TO CONTROL EROSION |
| 16 | PICTURE | - TO ELIMINATE RESOURCE DAMAGE FROM HORSEBACK TOURS, ELIMINATE HORSEBACK RIDING |
| 16 | PICTURE | - TO ELIMINATE RESOURCE DAMAGE BY PEDESTRIANS, CREATE WALKWAYS AROUND MONUMENTS, AS NECESSARY, AND ERECT FENCES " " " " |
| 16 | PICTURE | - TRAILS AT LITTLE ROUND TOP ARE A GIVEN - LITTLE DAMAGE |
| 17 | PICTURE | NOTE: ALL BUSES. BUSES SHOULD BE RELEGATED TO RELIEF PARKING LOT AFTER DISPATCHING VISITORS ALONG |
| 17 | CHAP. 2 | MENTION OF ASPECTS - SHOULD NOT BE DISTURBED - IS RESTORED |
| 18 | " | PARKING LOT AT VISITOR CENTER WAS NOT DIFFICULT TO USE BEFORE CEMENT DIVIDERS WERE INSTALLED - ALSO DIVIDERS REMOVED NUMBER OF SPACES AVAILABLE FOR USE |
| 21 | " | NPS MANAGERS ARE NOT ANTICIPATING SIGNIFICANT LONG-TERM INCREASES IN VISITATION, WHY NEW VISITOR CENTER? |
| 21 | " | REMOVAL OF UP TO 611 ACRES OF HARDWOOD TREES, WOULD DEFINITELY AFFECT AIR QUALITY. THEY ABSORB A LOT OF CARBON MONOXIDE - ESPECIALLY FROM ALL THOSE BUSES YOU'RE PUSHING FOR, THE MAJORITY OF WHICH USE DIESEL FUEL. ALSO - HARDWOOD TREES PROVIDE FOOD (ACORNS, ETC.) FOR WILDLIFE SUCH AS SQUIRRELS, DEER, ETC. |
| 22 | " | CYCLORAMA VISIBILITY FROM VARIOUS PORTIONS OF BATTLEFIELD HELPS TO ORIENT FROM VARIOUS POINTS, ESPECIALLY AS COMPARED TO LOOKING FROM VIRGINIA NORTHWARD TOWARD A SMALL BUNCH OF TREES - OVER THERE |

## RESPONSES

a You are correct in stating that trees assist in maintaining good air quality. Trees use primarily oxygen and carbon dioxide during their respiratory and photosynthetic processes. Carbon monoxide and ozone are the two substances that are of greatest concern for automobile emissions. The Gettysburg area complies with the National Ambient Air Quality Standards and all state air quality standards for carbon monoxide. However, it does not meet those standards and is a marginal non-attainment area for ozone. Ozone pollution is not unique to the Gettysburg area, but is of concern for the entire eastern United States. To be an attainment area for ozone, a site cannot exceed the standard more than three times over a three-year period. The source of ozone in the region is from vehicle emissions along the East Coast, and from major stationary sources of nitrogen oxide emissions in the Ohio River valley. The emissions from private vehicles driving through the park are minimal compared with the larger regional emissions. The Pennsylvania Department of Environmental Resources has concurred that actions within the park have minimal effects on regional air quality.

The draft GMP/EIS indirectly addresses air quality by proposing alternate transportation (some type of shuttle system) to high volume areas, such as between the Visitor Center and the most highly visited sites (Soldiers' National Cemetery, Little Round Top, Angle, Peach Orchard, Peace Light Memorial. This proposal is included in all three of the action alternatives (Alternatives B, C, and D). Currently, the park requires all buses to shut their engines off at these highly visited sites in the park to help reduce local emissions. Because ozone pollution is more of a regional issue than a local one, the park would continue to consult with the state and reduce auto emissions through the implementation of a shuttle system.

a You are also correct in stating that hardwood trees provide food for a variety of wildlife species. The draft GMP/EIS does not call for the complete removal of all wooded areas on the park, only areas that were not wooded in 1863. The areas proposed for tree removal would be rehabilitated as pastures or meadows and they in turn would provide food and habitat for a different group of animals such as cottontail rabbits, meadow voles, upland sandpipers, and bobolinks.

PE OTHER

25 CHAP [illegible] EXPANSION OF EXISTING NATIONAL BOOKSTORE TO INCLUDE A MUSEUM STORE IS SAME AS HAVING ARTS & CRAFTS GALLERY AND IS COMMERCIAL.

29 ALT [illegible] - SKETCH SHOWS LITTLE ROUND TOP AS PROBABLY WAS IN 1863 - AFTER BEING OVERRUN BY TROOPS.

30 CHAP [illegible] AVENUE FENCING WAS AN IDEA OF TIME WHEN CIVIL WAR VETERANS HELPED CREATE PARK - IS NOT FEASIBLE TODAY. PIPE WOULD NOT LAST.

53 TABLE 2 - VISITOR USE: ACCESSIBLE TO ALL SEGMENTS OF POPULATION

56 ALT C FEATURES DAMAGED, DETERIORATED, OR REMOVED, TO BE REPLACED - TOO EXTREME AS AN ENTIRETY.

56 ALT B - MODERN WAYSIDE SIGNS ARE MORE EXPLANATORY IN NATURE THAN MARKERS.

56 ALT B - I BELIEVE A LOT OF VISITORS PREFER TO VISIT BATTLEFIELD SITES AT THEIR OWN PACE, AND TO BE ABLE TO ABSORB CERTAIN AREAS MORE FULLY, RATHER THAN BRIEFLY, OR NOT AT ALL AS ON A SHUTTLE BUS.

b 63 CHAP [illegible] ALT A TABLE [illegible] NPS SEEMS TO GO OUT OF ITS WAY NOT TO PROVIDE INTERPRETATION OF CONTEXT OR CONSEQUENCES OF BATTLE. THEY CAN SAY THE SAME THINGS NOW THAT THEY PORTRAY THEY'LL BE ABLE TO SAY AT THE NEW VISITOR CENTER.

65 CHAP [illegible] WITHIN THE LAST 6 YEARS, THE AVENUES AND MOWED LAWN BESIDE THEM SUDDENLY BECAME MORE

b The 1990 boundary legislation for GNMP, cited in Section 1.2.1, Page 5, of **the draft GMP/EIS**, directed NPS to take action to interpret the Battle of Gettysburg in the larger context of the Civil War, including the causes and consequences of the war, and the war's effect upon all American people. Under Alternative C improved exhibits and programs in the new museum complex would help meet this mission.

Section 1.6.3, p. 15, and Section 4.4.3, page 244, of the draft GMP/EIS directly addresses why the NPS believes that the current visitor center is inadequate for the needs of Gettysburg NMP and its visitors, and what impact a new museum complex would have upon interpreting Gettysburg in the context of the Civil War.

| COMMENTS | | RESPONSES |
|---|---|---|
| PG OTHER | | |
| 65 (CON'T) | COMMEMORATIVE. I SUGGEST YOU RETHINK THIS POLICY, USE A LITTLE COMMON SENSE, AND PROVIDE ADDITIONAL PARKING WHERE NEEDED. | |
| 67 2.3 | SPECIAL USES CAN BE DISCONTINUED AT ANY TIME. | |
| PAGES 75-CONT | VISITOR USE: PROVIDING TRANSPORTATION TO ONLY HIGH-VOLUME AREAS IS NOT A COMPLETE TOUR. | |
| 76 " | [illegible] AND YOUTH CAMPGROUND ARE NOW IN [illegible] SPOTS - HOW SERENE AND CONTEMPLATIVE WOULD THE VISITOR CENTER BREEZE BE? | |
| 76 " | ADDING TEN CARS GOOD: AT LEAST ADDING MORE PARKING SPACES ALONGSIDE PRESENT ROADWAY | |
| 122 ALT C | EXCESS REMOVAL OF WOODLANDS, BUILDING UNNECESSARY FENCING, AND ADDING SPOTS [illegible] TO CREATE PROBLEMS OF CARE ARE NOT NECESSARY TO EXPLAIN BATTLE. | |
| 122 ALT C | THE ROSE BARN BURNED DOWN IN 1913. THERE IS NO REASON TO REBUILD IT. | |
| 122 ALT C | INDICATIONS AND INTERPRETATIONS OF MISSING HOUSES WOULD ALSO ENCOURAGE UNWANTED ARCHEOLOGICAL TRESPASSING. (SEE PG. 127) | |
| 123 " | NOT NECESSARY TO RESTORE GRADE LEVELS TO CIVIL WAR STONES. PERHAPS LATER | |
| 123 " | PLAN (1956) TO COMBINE ADMINISTRATIVE AND MAINTENANCE FACILITIES AT CONTRASTLAND SOUNDS GOOD | |

# COMMENTS

| PG | OTHER | |
|---|---|---|
| 125 | ALT. DRAWINGS | FIELD PATTERNS CHANGED WOULD RESULT IN MORE DIFFICULTY FARMING SMALLER AREAS (TURNING ETC.) AND DEFINITELY EROSION. |
| 126 | " | REVISING FIELD PERMITS MAY RESULT IN LOSS OF PARTIES INTERESTED IN PIECEMEAL FARMING. |
| 128 | " | IT TAKES MORE THAN ANNUAL MAINTENANCE FOR TEE-SMALL FIELDS. |
| 129 | 2.9.2 | RESANDING RANGER TOURS TO INCLUDE ENTIRE BATTLE-ACTION AREA - WHY NOT DONE NOW? |
| 160 | TABLE 13 | UNDER ALT. A, VISITORS NOT ADEQUATELY INFORMED REGARDING CORRECT DOG BEHAVIOR (NO COMMON SENSE?) ALSO, INFORMATION CAN BE GIVEN UNDER ALT. A, AS WELL AS UNDER ALT B, C, OR D |
| 162 | TABLE 16 | ALL ALT. A ITEMS SHOW A DECREASE OR UNCHANGED STATUS, WHILE ALT. B, C, & D SHOW AN INCREASE |
| 163 | TABLE 16 | WHAT A LOVELY PICTURE TO PAINT! BUT THESE ARE LESS, EVEN, THAN PREDICTIONS - THEY ARE MAYBES. |
| 168 | CHAP. 3 3.1.2 | ONE-WAY ROADS CREATE PROBLEMS SUCH AS GOING ALL THROUGH TOWN TO GET A SHORT DISTANCE AWAY, SUCH AS PEACH ORCHARD TO AMPHITHEATER; OR TANEYTOWN RD. TO LITTLE ROUND TOP. |
| 169 | CHAP. 3 3.1.3 | ANNUAL OPERATING INCREASE IN 1996 OBTAINED BY SEN. SANTORUM WAS SUPPOSED TO GO TO BUILDING STRUCTURES & ROUTINE PRESERVATION/MAINTENANCE. INSTEAD, IT WENT TO MORE STAFFERS. |

# RESPONSES

## COMMENTS

| PG | OTHER | |
|---|---|---|
| 170 | 3.13 | THIS IS AFTER THE FACT, BUT WHY WAS A CYCLORAMA THAT WAS NOT DESIGNED TO ALLOW THE PAINTING TO HANG IN ITS ORIGINAL FORM ACCEPTED? AND WHY, INDEED, WAS THE PAINTING THEN HUNG, REGARDLESS? |
| 172 | 3.15 | IF NEW CROPS ARE BEING PLANTED IN COOPERATION WITH SOIL CONSERVATION CORPS, THERE SHOULD BE LITTLE OR NO EROSION. TO CHANGE TO SMALLER FIELDS, IGNORING SOIL CONSERVATION PRACTICES, THERE WILL DEFINITELY BE EROSION |
| 173 | 3.22 | QUESTION OF CLEARED LANDINGS? ACROSS WHICH CONFEDERATES ATTACKED IN ATTEMPT TO DRIVE UNION FORCES OFF CULP'S HILL, CEMETARY RIDGE, AND THE ROUND TOPS. (BOTH SIDES HELD POSITIONS ON THE RIDGES BEFORE THIS ACTION) |
| 176 | 3.29 | BETTER TALK TO PEOPLE DOING FARMING BEFORE TAKING UP TILES. THEY SURE DON'T WANT TO GET STUCK IN SWAMPY AREAS. THIS PURELY DOES NOT MAKE SENSE. |
| 183 | CHAP 3 | IF VISITORS FOLLOW PARK TOUR, THEY HAVE TO GO TO (OR PAST) VIRGINIA MEMORIAL. ALSO I BELIEVE A LOT OF PEOPLE VISIT DEVIL'S DEN, WHICH YOU NEGLECTED TO MENTION. |
| 183 | " | MOST USED SERVICE - RESTROOMS - DOES THAT SOUND LIKE SOMETHING YOU SHOULD GET RID OF? THINK OF FAMILIES WITH CHILDREN, ALSO THE 24% OF OLDER PEOPLE! |

c

## RESPONSES

c The draft GMP/EIS notes that under any alternative, the park would continue to consult with all the appropriate state and federal agencies in order to keep the program environmentally sensitive. Under any alternative, soil conservation plans would continue to be an integral part of each agricultural lease.

# COMMENTS

| PG | OTHER | |
|---|---|---|
| 183 | CHAP 3 | MAJORITY OF VISITORS RATED THEIR EXPERIENCE AS GOOD OR VERY GOOD, AS IN 67%-69%. THIS WOULD NOT SEEM TO NECESSITATE ALL THE CHANGES NPS WANTS TO MAKE, TO MAKE BATTLEFIELD MORE REALISTIC. |
| 184 | CHAP 3 | WHEN ASKED FOR SUGGESTIONS FOR FUTURE AT PARK, MOST FREQUENT SUGGESTIONS WERE: (1) LIMIT COMMERCIALISM, (2) IMPROVED PARKING, (3) IMPROVED SIGNAGE, (4) ADDING SHUTTLE SERVICE, AND (5) CHANGE REFERE FOR SHUTTLE SERVICE, 63% WERE LIKELY TO USE! |
| 184 | 3.3.3 | HIGHWAY-SIGNS TO VISITOR-CENTER NOT ADEQUATE FAULT OF NPS? |
| 184 | " | INADEQUATE PARKING COULD BE ELIMINATED SOMEWHAT BY MOVING THOSE BUSES OUT, AND ELIMINATING PARKING LOT ISLANDS. |
| 184 | " | PEDESTRIAN CONNECTIONS TO: NATIONAL CEMETARY - SIMPLY CROSS THE STREET FROM PRESENT VISITOR CENTER. THERE IS AN EASILY-SEEN PAVED WALKWAY GOING DIRECTLY FROM VISITOR CENTER TO CYCLORAMA. THE OVERFLOW LOT AT FANTASYLAND COULD PROVIDE A SHUTTLE BUS. |
| 184 | " | VISITOR-CENTER-INFORMATION-SIGNS, OVERHEAD INDICATING SPECIFIC INFORMATION AREAS. ALSO, LARGE INFORMATION BOARD FOR DAILY SPECIAL ACTIVITIES. (SOME OF WHICH, BY THE WAY, COULD HELP CONTROL TRAFFIC ON BATTLEFIELD) |
| 184-185 | 3.3.3 | WITH WAYSIDES AT VARIOUS STOPS ON BATTLEFIELD MUCH CAN BE EXPLAINED AND PORTRAYED. NO ONE EXPECTS EVERYTHING TO LOOK EXACTLY THE SAME AS IT DID 135 YEARS AGO! (EXCEPT NPS.) |

# RESPONSES

## COMMENTS

| PG | OTHER | |
|---|---|---|
| 185 | CHAP 3 | AS FOR THE AUTO TOUR HELPING TO NAVIGATE THE ONE-WAY ROADS, SOME OF THE ROADS HAVE BEEN CHANGED TO ONE-WAY FOR WHATEVER REASONS. THEY WORKED FINE AS TWO-WAY ROADS FOR A LOT OF YEARS. ONE-WAY ROADS CAUSE MORE CONGESTION. |
| 185 | " | EVEN WITH A MAP, IT IS DISGUSTING TO WANT TO GO TO A CERTAIN SPOT A SHORT DISTANCE AWAY, BUT CANNOT BECAUSE OF ONE-WAY ROADS. THIS SOMETIMES ENTAILS GOING MILES OUT OF YOUR WAY. |
| 186 | " | THE MUSEUM SHOULD HAVE BEEN INCLUDING INFORMATION ON THE CONTEXT OF THE BATTLE & CIVIL WAR — HOW THEY GOT FROM TO THIS POINT, & HOW GETTYSBURG BATTLE INFLUENCED REST OF CIVIL WAR. THE GBG PORTION OF CIVIL WAR DID NOT JUST DROP DOWN FROM OUT OF NOWHERE AND THEN, AFTER 3 DAYS, JUST DISAPPEAR! |
| 186 | 3.3.6 | PLAN TO ADD 53 NEW WAYSIDE EXHIBIT — GOOD. |
| 188 | 3.3.12 | EASTERN NATIONAL OPERATES SALES CENTERS AND PROVIDES MAINTENANCE & JANITORIAL. WHAT PART DOES NPS PLAY? |
| 190 (TOURISM) | 3.4.4 | STATES THAT "GETTYSBURG HAS SUBSTANTIAL REGIONAL RESIDENT MARKETS FROM WHICH TO DRAW VISITORS." FURTHER ALONG IN SAME SECTION, "GETTYSBURG DOES NOT HAVE IMMEDIATELY ADJACENT LARGE RESIDENT MARKETS TO DRAW UPON." I WOULD CALL 30 MINUTES TO ONE HOUR PRETTY CLOSE, AS IN HANOVER, YORK, CARLISLE, HARRISBURG, FREDERICK, MD AND PERHAPS LANCASTER. |
| 191 | 3.4.4 | SCHOOL GROUPS AS A DECLINING SEGMENT OF VISITORS — I THINK SCHOOLS ARE NOT TEACHING U.S. HISTORY AS THEY ONCE DID, AND STUDENTS ARE NOT REALIZING THEIR HERITAGE. PERHAPS A SPECIAL PROGRAM COULD BE DEVELOPED THAT WOULD ENCOURAGE AND ENTICE SCHOOLS TO COME TO GETTYSBURG? |

## RESPONSES

| Pg | OTHER | |
|---|---|---|
| 198 | 3.5.1 | ALL SITES WITHIN THE PARK ARE NOT ACCESSIBLE BY A DIRECT ROUTE FROM PUBLIC ROADWAY, ONLY BY INDIRECT AND INCONVENIENT ROUTE. |
| 200 | 3.5.3 | CONSIDER: PART OF THE TRAFFIC CONGESTION IS PEOPLE GOING TO AND FROM WORK. OTHER TRAFFIC FROM TOURISTS IS A CONDITION YOU WILL FIND AT ANY POPULAR TOURIST AREA. |
| 200 | 3.5.3 | IF TRAFFIC SEEMS HEAVY ON STEINWEHR AVE, A PROPOSED VISITOR CENTER JUST OFF BALTIMORE PIKE WOULD PROVE TO BE A NIGHTMARE. |
| 203 | 3.5.1 | INTERSECTION OF STEINWEHR AVE., TANEYTOWN RD. & WASHINGTON ST HAS A TRAFFIC LIGHT TO HELP CONTROL TRAFFIC. |
| 203 | 3.5.7 | TOUR BUSES SHOULD NOT EVEN ATTEMPT TO DRIVE ON THE CIRCULAR PORTION OF VIRGINIA MONUMENTS AREA - THEY SHOULD PARK ACROSS ROADWAY FROM MONUMENT. ANYONE WITH A VALID DRIVER'S LICENSE SHOULD BE ABLE TO NEGOTIATE THE CIRCULAR PORTION IN A CAR. BY THE WAY, WHAT "DAMAGE TO UNDERGROUND RESOURCES" ARE YOU REFERRING TO - DIRT? |
| 203 | 3.5.7 | ENTRANCE AND EXIT DRIVEWAYS ARE SIMPLE RIGHT TURNS, AND AMPHITHEATER IS GOOD RIGHT WHERE IT IS |
| 203 | 3.5.7 | DEVIL'S DEN - LEAVING DEVIL'S DEN, THE ROAD IS ABOUT STEEP UPHILL AND A SHARP CURVE; A SITUATION WHERE I DON'T THINK ANYONE WILL BE DRIVING VERY FAST - ESPECIALLY SINCE THERE IS A 25 MPH SPEED LIMIT. |

| COMMENTS | | RESPONSES |
|---|---|---|
| PG | OTHER CHAP'S | |
| 204 | 3.2 | THE OBVIOUS ANSWER TO AVENUES THAT ARE TOO NARROW IS TO WIDEN THEM. IF YOU WANT PEOPLE TO COME HERE, YOU HAVE TO GIVE THEM ROOM TO DRIVE ON THE ROADS, AND ROOM TO PARK. |
| 204 | " | CONFUSION BETWEEN ONE-WAY & TWO-WAY AVENUES IS BECAUSE YOU HAVE CREATED IT. |
| 204 | " | PARKING ALONG REYNOLDS AVE. & W. CONFEDERATE AVE.: "DAMAGE TO GRASSED AREAS NECESSITATED PLACING GRAVEL ALONG SIDE OF ROAD IN THESE AREAS." DOES THAT SEND A MESSAGE, THAT YOU NEED NOT ONLY GRAVEL, BUT MACADEM THERE TO ACCOMMODATE TOURISTS WHO WANT TO LOOK AT SOMETHING? |
| 204 | " | AS FOR THE EXTRA GROUND PEOPLE WOULD BE USING: IF YOU WANT PEOPLE TO COME, YOU HAVE TO ACCOMODATE THEM IN SOME WAYS. |
| 204 | " | CREATE MORE PARKING AT LITTLE ROUND TOP. THERE IS ROOM FOR MORE CARS ON APPROACH TO TOP, ALSO SEVERAL BEYOND TOP |
| 204 | " | HANCOCK AVE. IS FLAT FOR MOST PART. PEOPLE SHOULD LOOK BEFORE CROSSING AVE., & SPEED LIMIT IS 25 MPH. |
| 208 | 3.2 | YOU HAVE GOT TO PROVIDE MORE PARKING, CLOSE TO MONUMENTS AND OTHER SITES. YOU SPEAK OF EXPECTING INCREASED VISITATION, BUT DON'T EVEN HAVE ENOUGH PARKING NOW FOR PEOPLE TO STOP & READ SOMETHING OR GET OUT TO VIEW IT CLOSE UP. |
| 208 | " | ARCHEOLOGICALLY, I DON'T BELIEVE ANYONE IS EVER GOING TO DIG UP ALONG SIDE THE AVENUES TO LOOK FOR RELICS (REFERRING TO NPS) THE SPACE WOULD BE BETTER USED FOR ADDITIONAL PARKING SO PEOPLE |

| | COMMENTS | RESPONSES |
|---|---|---|
| PG OTHER | | |
| | CAN BETTER UNDERSTAND THE TOTAL PICTURE HERE. | |
| | YOU CAN'T SAVE EVERYTHING, YOU KNOW. | |
| 208 363 | IF HORSES ARE CREATING A PROBLEM, ELIMINATE THEM. NON-HISTORIC TRAILS WHICH CROSS HISTORIC TRAILS BECOME AN ABUSE OF HISTORIC TERRITORY, AND SHOULD NOT BE PERMITTED. | |
| 222 431 | RUNOFF FROM OKLAHOMA TO LEISTER BARN CAN BE EASILY DIVERTED, & OLD FRUIT TREES :) DIE, REGARDLESS. | |
| 222 " | SOLICIT FUNDS FROM STATES WHOSE MONUMENTS ARE IN NEED OF CARE. | |
| 222 " | YOU KNOW, A LOT OF THESE HOUSES JUST HAPPENED TO BE HERE AT THE TIME. THAT DOESN'T NECESSARILY MAKE THEM HISTORIC. AS I SAID BEFORE, YOU CAN'T SAVE EVERYTHING. | |
| 224 CHAN | NON-HISTORIC ROAD TRACES CAN BE PORTRAYED ON A WAYSIDE, WITHOUT PUTTING UP UNNECESSARY FENCES. | |
| 224 " | THE SHIRLEY PEACH ORCHARD IS A REFERENCE POINT ON THE BATTLEFIELD. IT SHOULD NOT BE TAKEN OUT OF PRODUCTION. MONEY RAISED FROM SALE OF PEACHES HELPS TO MAINTAIN THE ORCHARDS. TO DAT OVER $1,000 HAS BEEN RAISED THROUGH THIS PROGRAM. AN OLD ORCHARD IS THE SAME AS A NEW ONE; THEY ARE ALL SPRAYED OR THERE WOULD BE NO PEACHES & PERHAPS NO TREES. RE: PUBLIC USE - PEOPLE STILL EAT THE PEACHES, WHEREVER THEY'RE GROWN. A LOT OF PEOPLE THINK IT'S KINDA SOME THING TO EAT PEACHES RIGHT FROM THE BATTLEFIELD! (NOT REALIZE IT CAN'T BE THE SAME TREES BUT THIS COULD BE CAPITALIZED UPON) | |

| | COMMENTS | RESPONSES |
|---|---|---|
| PP OTHER | YOU SAY ~~YOU WANT TO [illegible]~~ NATURALLY, (AND THEY WILL, WITHOUT YOUR INTERFERENCE) THEM TOO SAY YOU WANT TO CUT DOWN THE OVERSTORY TREES NEARING END OF THEIR LIFESPAN. | |
| 226 43.2 | THE HICKORY AND OAK TREES CAN GROW TO BE SEVERAL HUNDRED YEARS OLD. | |
| 226 " | REGARDING NON-NATIVE SPECIES - THEY WOULDN'T BE GROWING HERE IF THEY WEREN'T NATIVE! ALSO REGARDING CUTTING TREES DOWN - CUTTING DOWN REDBUD & DOGWOOD TREES ON HILLSIDE BELOW LITTLE ROUND TOP NEAR TO DEVIL'S DEN IS NATURICIDE SHORT OF A CRIME! THEY ARE CERTAINLY NATIVE TO THE AREA, AS WELL AS OTHER SPECIES GROWING [illegible] A DESOLATE LOOK IN THAT AREA WOULD BE AN AFTERMATH OF BATTLE, AND NOT A NATURAL LOOK OF THAT TIME. YOU DON'T THINK SOMEONE FARMED THAT, DO YOU? A LOT OF PEOPLE LIKE TO COME TO THE PARK IN THE SPRING TO SEE THE REDBUDS BLOOMING, AND THAT IS ONE OF THE PRIME AREAS TO DO SO. | |
| 226 4.33 | NPS DOES NOT OFFER PROGRAMS REGARDING THE COMMEMORATION OF THE BATTLE. THE BATTLEFIELD IS THE COMMEMORATION! | |
| 226 " | WAITING IN LINE: AT BUSY TIMES, NO ONE EXPECTS TO JUST WALK UP AND BE WAITED ON. EVERYBODY CAN'T BE FIRST IN LINE. | |
| 226 " | THERE ARE PLENTY OF MUSEUM EXHIBITS. YOU JUST HAVE TO ROTATE SOME OF THEM. CUT DOWN ON SOME OF THE CRAP AND SOME OF THE BORING OR SOMETHING ELSE. | |

| Pg | OTHER | |
|---|---|---|
| 228 | 43.3 | THE CYCLORAMA BUILDING IS PLENTY ACCESSIBLE. |
| 231 | CHART | FORCASTING LESS ATTENDANCE DUE TO LACK OF INVESTMENT IS RIDICULOUS! |
| 237 | 4.4.1 | CYCLORAMA AND VISITOR CENTER SITES PROVIDE MORE OF A FOCUS TO THAT PORTION OF THE BATTLEFIELD THAN JUST BARE GROUND. |
| 237 | " | OTHER WAYS CAN BE ADDED TO WITHOUT REMOVING THE AMPHITHEATER |
| 237 | — " | PICNIC AREA: NICE ASIDE TO STOP ALONG TOUR, FOR A BREAK-IN TOUR |
| 241 | 4.4.3 | CATTLE GRAZING IN PASTURES NEED WATER TO DRINK |
| 241 | 4.4.3 | EXHIBITS TO DESCRIBE CONDITIONS THAT LED TO CIVIL WAR I THINK THEY ALREADY KNOW, OR THEY WOULDN'T BE HERE. THE EXHIBITS SHOW CONDITIONS DURING THE WAR. |
| 244 | " | ADEQUACY OF MUSEUM EXHIBITS - THERE IS AN ABUNDANCE OF MATERIAL EXHIBITS NOW, WITH TOO MUCH REPETITION, ESPECIALLY GUNS. |
| 244 | " | CYCLORAMA PAINTING WOULD NOT BE IMPROVED IF HUNG SOMEWHERE ELSE. IT IS UNIQUE AND BEAUTIFUL IN ITS OWN RIGHT. |
| 245 | " | IT IS NOT THE RESPONSIBILITY OF THE NPS TO PROVIDE TOURIST, LODGING, AND AREA AMUSEMENT INFORMATION. THERE IS A GETTYSBURG TOURIST CENTER IN TOWN. |
| 246 | 4.4.4 | WE ALREADY HAVE RETAIL AND FOOD SERVICE IN THE AREA |
| 246 | " | WHY DOES ASSUMPTION OF MORE VISITORS ONLY APPL TO PLANS B-C-D? IS THIS THE "BUILD IT AND THEY WILL COME" THEORY? |

| COMMENTS | | RESPONSES |
|---|---|---|
| PG | OTHER | |
| 248 | 4.4.6 | AMAZING IDEA FOR RELEGATING BUSES!? WHY AREN'T YOU USING THIS PLAN NOW? |
| 248 | " | ENCOURAGING VISITORS TO AVOID AREAS THAT ARE BUSY IS DEPRIVING THEM OF THE COMPLETE BATTLE EXPERIENCE YOU TALK ABOUT. THIS ESPECIALLY APPLIES TO BUS GROUPS THAT MAY ONLY PAUSE AT AN AREA, RATHER THAN BE ABLE TO GET OUT AND ROAMING CLOSER ALL TO ORIENT THEMSELVES ON THE BATTLEFIELD. |
| 248 | " | "HISTORIC GUTTERS"?! FOR CRYING OUT LOUD, MAKE NEW GUTTERS, CURBS, ETC. WHERE NEEDED AND GET ON WITH IT! |
| 251-4.5.1 | | THE "INTRUSIVE VEGETATION" YOU SO FLOWERINGLY REFER TO IS THE GRASS & SOD PLACED BY THE NPS TO ENCOURAGE MOWING. REMOVING THIS, AS A PRIORITY, WOULD THEN ENTAIL CUTTING GRASS WITH A WEED WACKER. WHY NOT JUST DO THAT NOW TO DELINEATE EACH MARKER? (BY THE WAY, I DON'T KNOW THAT A WEED WACKER MAY NOT HAVE A DETRIMENTAL EFFECT ON THE STONES.) |
| 252 | 4.5.1 | NOT NECESSARY TO REWAR HISTORIC LANES. |
| 255 | CHAP 4 | REMOVAL OF TREES NOT NECESSARY, AND IS A POTENTIAL MAJOR IMPACT ON AREA ECOLOGY. IT DOESN'T MATTER HOW MUCH FOREST THERE IS IN SURROUNDING COUNTIES OR IN STATE OF PA.; THIS WOULD IMPACT THIS PARTICULAR AREA! |

ALTERNATIVE C

| Pg | OTHER | |
|---|---|---|
| 266 | 4.6.1 | REMOVAL AND ADDITION OF FENCES NOT NECESSARY |
| 266 | " | GRADING AROUND GRAVE MARKERS ADDRESSED PREVIOUSLY. |
| 267 | " | IS ROSE BARN ACCESSABLE TO PUBLIC? SIGNIFICANT TO THE OUTCOME OF THE BATTLE? OR IS IT NOW THE HOME OF "SOMEONE SPECIAL"? |

ALT. D

| | | |
|---|---|---|
| 261 | 4.7.1 | REMOVING MODERN AMENITIES = TENANTS UNLIKELY. MORE CHANCE OF FIRE DUE TO UNFAMILIARITY WORKING WITH WOOD STOVES. BETTER TO HAVE SOMEONE LIVING THERE. |

GLOSSARY

| | | |
|---|---|---|
| 367 | | REHABILITATION: MAKING POSSIBLE COMPATIBLE USE FOR PROPERTY THROUGH REPAIR, ALTERATIONS & ADDITIONS WHILE PRESERVING PORTIONS OR FEATURES THAT CONVEY ITS HISTORICAL, CULTURAL OR ARCHITECTURAL VALUE. |

APPENDIX - 3 - LEGISLATION

| | | |
|---|---|---|
| 319 | SEC. 4 | RULES SHALL PROVIDE FOR CONVENIENT ACCESS BY VISITORS TO ALL SUCH MONUMENTS WITHIN THE PARK, AND THE GROUND INCLUDED THEREIN. |
| 316 | TABLE 4 | (16) WILL MEADE RD. BE REOPENED, AS IT WAS DURING CIVIL WAR, INTERSECTING W. ON TANEYTOWN RD.? |
| 319 | TABLE 5 | DOES MENTIONMENT ENDORSEMENT ONLY APPLY AS PART OF |

261

Individuals

## COMMENTS

[illegible] FUND FOR MONUMENTS? I.E. NOT ONE SHOULD BE CREATED BY ASKING STATES INVOLVED TO DONATE.

PG OTHER

320 THERE'S GOOD STATIONS SHOULD STAY, AND ESPECIALLY THE REST ROOMS.

320 " - S NEED IS FOR MORE PARKING AREA ON BATTLEFIELD NOT LESS.

d " - 6 $26,45,76 THIS IS A LOT OF MONEY FOR SMOKE DETECTORS

" - 9 DON'T REHAB OLD LANES, CLOSE THEM OFF!

323 MONUMENTS - PARK RESOURCES BEING DAMAGED - ESPECIALLY HORSE TRAILS SOLUTION IS SIMPLE - ELIMINATE HORSES.

323 " OVERCROWDED CONDITIONS IN PARK RESTROOMS - SO YOU WANT TO ELIMINATE RESTROOMS?!

323 " "LIMITATIONS TO PERSONAL INTERPRETATION AND WALKING TOURS" - WHAT PERCENTAGE OF VISITORS ACTUALLY ACCESSED THIS, AND WERE THEY UNABLE TO TAKE ADVANTAGE OF IT? — THIS WOULD BE MAINLY A SUMMER OCCURENCE

323 " "TRAFFIC CONDITIONS ON SOME AVENUES MANY DAYS OF YEAR" - THIS, TOO, WOULD BE MAINLY A SUMMER OCCURENCE

327 #4 LETTER OF INTENT THIS REFERS TO REMOVING EXISTING ENTRY ROADS AND PARKING. EARLIER REFERRALS ARE MADE TO USING THE PRESENT CYCLORAMA ROAD AS A CROSS OVER BETWEEN TANEYTOWN RD. AND STEINWEHR AVE. ALSO, PARKING LOT AT PRESENT VISITOR CENTER WOULD STILL BE NEEDED TO ACCOMODATE VEHICLES OF VISITORS TO CEMETARY. THE PARKING LOT IS NO MORE OF AN EYESORE THAN ALL THE MOTELS AND OTHER BUSINESSES ABUTTING IT!

e 328 #4 REGARDING AN AGREEMENT WITH FOUNDATION FOR LONG-TERM USE OF FACILITIES BY NPS - DOES THIS REFER TO THE INITIAL 20 YEAR PERIOD, OR BEYOND THAT?

## RESPONSES

d The cost for fire protection for 47 historic buildings listed in table 49, 50 and 51 provides for the installation of fire detection and sprinkler systems, hook up to a municipal water supply, remote water storage tanks for structures in remote locations, and activation alarms to alert the appropriate fire department.

e This sentence in the Letter of Intent refers to the initial 20-year agreement between the NPS and the Gettysburg National Battlefield Museum Foundation.

ADDITIONAL COMMENTS

THERE IS ROOM IN THE CYCLORAMA CENTER FOR A LOT MORE DISPLAYS.

MONEY SHOULD BE RAISED FIRST—THEN THINK ABOUT STARTING PROJECTS.

EISENHOWER FARM IS A NATIONAL HISTORIC SITE, NOT A PART OF THE GETTYSBURG NATIONAL MILITARY PARK. IT SHOULD NOT BE INCLUDED AS A PART OF THE BATTLEFIELD EXPERIENCE. THERE IS PLENTY OF ROOM AT THE EISENHOWER FARM TO PROVIDE A PARKING LOT AND TICKET OFFICE, AND TO HANDLE TOURS SEPARATELY FROM NPS. THIS WOULD ALLEVIATE SOME TRAFFIC FROM VISITOR CENTER AREA.

THE NEW VISITOR CENTER CAN BE LOCATED ON OR OFF PARK LANDS. WILL NOT CONSIDER AGAIN THE BUTTERFIELD FARM? OR OTHER AREA OF FIRST-DAY BATTLE, SUCH AS MUMMASBURG ROAD?

309 SEC 6 APPENDIX 3 "AN ACT" (1895) "PROVIDED THAT NOTHING CONTAINED IN THIS ACT SHALL BE DEEMED AND HELD TO PREJUDICE THE RIGHTS ACQUIRED BY ANY STATE OR BY ANY MILITARY ORGANIZATION TO THE GROUND ON WHICH ITS MONUMENTS OR MARKERS ARE PLACED, NOR THE RIGHT OF WAY TO THE SAME

309 SEC 6 APPENDIX "THAT IT SHALL BE THE DUTY OF THE SECRETARY OF WAR TO ESTABLISH AND ENFORCE PROPER REGULATIONS FOR THE CUSTODY, PRESERVATION, AND CARE OF THE MONUMENTS NOW ERECTED OR WHICH MAY BE HEREAFTER ERECTED WITHIN THE LIMITS OF THE SAID NATIONAL

## COMMENTS

MILITARY PARK; AND SUCH RULES SHALL PROVIDE FOR CONVENIENT ACCESS BY VISITORS TO ALL SUCH MONUMENTS WITHIN THE PARK, AND THE GROUND INCLUDED THEREIN, ON SUCH DAYS AND WITHIN SUCH HOURS AS MAY BE DESIGNATED AND PROMULGATED BY THE SECRETARY OF WAR.

f VI-12 WHERE MONEY TO COME FROM FOR NEW EMPLOYEES EACH YEAR?

IV-4 WELCOME CENTER AND LICENSED BATTLEFIELD GUIDE CENTER ADD UP TO MORE SPACE THAN THE NPS MUSEUM!

MISTAKES IN FIGURES-

| | | | | |
|---|---|---|---|---|
| III-10 | V-10 | VI-7 | | |
| III-12 | V-11 | APPENDIX TABLE | A6 | B6 |
| III-13 | V-12 | " " | A7 | B7 |
| | | " " | A8 | B8 |
| | | " " | A11 | B12 |

g 202 TABLE 26 VISITOR CENTER PARKING LOT-NUMBER OF VEHICLES IN LOT INCORRECT-90-290-515-575-425-350-315-240-260

## RESPONSES

f Funds for the support of NPS, cooperating association, and/or Museum Foundation employees would come from a combination of NPS operating funds, revenues generated in the proposed museum complex, and donated funds.

g This table has been revised.

SUMMARY

THE OLD VISITOR CENTER SHOULD STAY, AND CAN CONTAIN ADMINISTRATORS OFFICES AS WELL AS STORAGE.

THE VISITOR CENTER PARKING LOT SHOULD STAY, ESPECIALLY WITH ITS EXCELLENT PROXIMITY TO NATIONAL CEMETARY.

PROPOSED NEW VISITOR CENTER STRIKES US AS A "BUS STATION" AND A "HOT DOG STAND".

THE CYCLORAMA PICTURE DOESN'T HAVE TO BE IN A NEW BUILDING TO BE ENJOYED. ALSO, THERE IS ROOM FOR MORE STORAGE AND DISPLAYS IN THAT BUILDING

EISENHOWER TOURS SHOULD ORIGINATE AT THE EISENHOWER FARM. THERE IS PLENTY OF ROOM FOR PARKING OUT THERE, AND IT HAS NO CONNECTION TO THE BATTLE OF GETTYSBURG.

THE FIELDS SHOULD BE FARMED AS THEY ARE NOW, AND THE TREES SHOULD NOT BE REMOVED.

h ROADS SHOULD BE IMPROVED TO ALLOW MORE PARKING, AS PER ACT OF 1895, SEC. 6 (PG. 309 IN GMP BOOK)

h The avenue system and approaches still provide the "convenient access" required in Section 6 of the park's establishing law. Because the avenue system contributes to the national register significance and eligibility of the park, neither the park nor the State Historic Preservation Officer is in support of changing this historic landscape feature. Widening of the park's avenues would change the character of these park avenues. In addition, widening the avenues as little as two feet on each side of the road would potentially impact archeological resources from the battle. Widening would change the historic appearance and alignment of the surviving original park avenues and it would adversely impact the monuments, markers, cannon, breastworks, stone walls, and trees that are adjacent to the avenue edge. In short, widening of the avenues has detrimental effects not only on the historic character of the avenues themselves but on a range of other contributing and significant resources as well. It is the intent of the NPS to permit parking on the existing avenue surface in order to preserve the historic character of these commemorative era resources.

| COMMENTS | RESPONSES |
| --- | --- |
| CEMETARY IS BEAUTIFUL JUST AS IT IS. TREES SHOULD REMAIN UNLESS DISEASED. DO THE FAMILIES OF LATER WAR VETERANS (W.W.II, VIETNAM, KOREA) WANT THE RESTING PLACE OF THEIR LOVED ONES DISTURBED?<br><br>IF A NEW VISITOR IS TO BECOME A REALITY, RAISE THE MONEY FIRST. DURING THAT PERIOD OF TIME, THE PLANS COULD BE REFINED, AND MANY COSTS CUT. ALSO, A DIFFERENT SITE MIGHT BE CONSIDERED.<br><br>WE WANT YOU TO KNOW THAT WE ARE NOT SOMEONE FROM A LONG DISTANCE AWAY, TELLING SOMEONE HOW TO DO THINGS WHEN IT WON'T AFFECT US. WE HAVE LIVED IN THE AREA SINCE 1947, AND HAVE TOURED THE BATTLEFIELD HUNDREDS OF TIMES, ALSO TAKING OUR CHILDREN AND GRANDCHILDREN. IN ADDITION, MY MOTHER (GLORIA'S) WAS BORN AND RAISED IN GETTYSBURG, AND MY GRANDFATHER WAS A BATTLEFIELD GUIDE FOR 40 YEARS; SO I WAS EXPOSED TO THE BATTLEFIELD AS EARLY AS THE 1930'S. MY GREAT-GRANDFATHER WORKED FOR THE BATTLEFIELD, AND MY AUNT AND UNCLE FARMED THE KLINGEL FARM FOR MANY YEARS.<br><br>SO YOU SEE, WE HAVE MORE THAN A PASSING OR LONG-DISTANCE INTEREST IN THIS PLAN. | |

## James Brown

Supt. John Latscher
Gettysburg Military Park
97 Taneytown Road
Gettysburg, Penna. 17325

Friday Oct. 2, 1998

Sir:

First I would like to thank you for sending me a copy of the General Management Plan for the Park and allowing me to present my views and opinions on this matter. I know that you are very busy with all you have to do and with all that is going on now so I will not go into details on my views and opinions but will try and keep them as brief as possible.

I am in favor of removing the trees and underbrush that were not there at the time of the battle within the following limits. From Herr's Ridge to the West edge of Gettysburg and from Oak Ridge to Hagerstown Road. From Oak Ridge to Barlow's Knoll and the area there in. From West Confederate Avenue to the East of the Main Union line running from the current Administration building that houses the cyclorama to the Round Tops. From the Round Tops, from the Devil's DEn area and South of the Devil's Den to Confederate Avenue. This would also include the area of the South Cavalry field. From the Baltimore Pike through Culp's Hill and the Spangler Spring area.From East Confederate Avenue to the Hanover Road. I would also approve of removal from the East Cavalry Field area. I feel that going beyound these areas to show where the Confederate troops were formed or in marching would not be in the best interest due to the cost of clearing and the following time and money required to maintain these clearings once they were cleared. If it is necessary to do further clearing to show the areas used by the troops for forming or arriving perhaps this could be done at a later time.

I am in favor of the building of the new visitor and Cyclorama building along the Baltimore Pike and the removal of the current visitor and cyclorama buildings and the restoration of the ground to its 1863 appearance. I would also like to see the removal of the Home Sweet Home Motel and The General Pickett Restaurant next door , along with as much of the Colt Park Area as possible, and the restoration of the area to its 1863 appearance. On a recent visit to Gettysburg we drove by what I understand is to be the site of the new center. It appeared to be occupied by two or more private residences. If this is correct I would assume that these homes would be removed for the new center.

## COMMENTS

Page Two

I am in favor of removing the current picnic areas along West Confederate Avenue along with the Amphitheater to the former Fantasyland site and restoring the area to its 1863 appearance.

I am in favor of the restoration of buildings that were on the battlefield at time of the battle. I would like to see the buildings that were there but that have by one way or another been lost be replaced. I would like to see the current peach orchard restored further North of the Wertz house as it was. I would like to see the Bliss Farm be made more acessable to the public. All buildings that were not on the field at the time of the battle to be removed.

a I am very strongly opposed to any more park roads being made one way and to any restrictions made with regards to private vehicles on park roads. Granted there are some park roads that are very narrow. At one time I measured the width of the road by the the angle and found that it was as wide as many of our highways here in Ohio which daily carry more traffic thewthe park road including trucks. I have visited the park since the mid to late 1930's. While there have been times when traffic was heavy and congested I have at no time found any real problems with traffic in the park. My visits to the park have been in all the months from February through November. I was there for the 100th anniversary of the battle and also the 125th. anniversary. It must be remembered that, by your own figures, the most of the visitors to the park are over 55 years of age. With increase in age comes an increase of problems which do restrict the visitors ability to get about. Although we do have more problems in walking we do not lessen in our desire to walk every inch of the battlefield. I had never walked Picketts charge until a few years ago. Then with just over 90 days having passed since I had a heart attack and under gone open heart surgery I decided to walk the charge from the Virginia Monument to Armistead marker and back again. My wife who has been a registered nurse for 40 years said not for me to make the walk as I would die on the field. I made the walk both ways with no problems. I cite this merely as an example of how many of us love the battlefield. To take away the use of private cars and be made to use a bus or other provided means of transportaion or shuttle would be taking away our ability to see the fields as we desire. While shuttles would, I assume , run on a frequest basis what happens if you are out in a field and need immediate emergency help????? Or if you are out in the field and a thunderstorm comes up. Should you wait in the rain till the next shuttle comes along?????

b I feel that adding another two feet to each side of the road is not going to have a great impact on the area and would not even be noticed except for the ease of traffic and the use of cars. I do feel that curbing should be placed along the edges of the roads to prevent vehicles pulling off the hard surface. I also feel that there should be a restriction placed on the size of the buses that use the park roads so that they may make turns and other problems that are caused by the large buses using the park roads.

## RESPONSES

a The draft GMP/EIS does not propose that any additional park avenues beyond those already designated to become one-way after resurfacing be converted to one-way traffic. The draft GMP/EIS does suggest seasonal restrictions on vehicle traffic on certain avenues, in order to reduce heavy traffic congestion and potential gridlock at several popular areas of the battlefield.

b Because the avenue system contributes to the national register significance and eligibility of the park, neither NPS nor the State Historic Preservation Officer is in support of changing this historic landscape feature. Widening of the park's avenues would change the character of these park avenues. In addition, widening the avenues as little as two feet on each side of the road would potentially impact archeological resources from the battle. Widening would change the historic appearance and alignment of the surviving original park avenues and it would adversely impact the monuments, markers, cannon, breastworks, stone walls, and trees that are adjacent to the avenue edge. In short, widening of the avenues has detrimental effects not only on the historic character of the avenues themselves but on a range of other contributing and significant resources as well.

Page Three

I feel that fences that are not vital to the Park Service and were not in place at the time of the battle should not be maintained. I feel that the use of cattle should be restricted. They could be a hazard to visitors in several ways which could result in injuries to the visitors.

I am somewhat opposed to the removal of drain tile and the restoration of the wetlands. Very few if any park visitor would know if a certain area was a wet or dry area in 1863 while permitting the area to be come a wetland again could cause visitors to have to walk through wet areas which probably would not be considered a thrill.

I am strongly opposed to the closing of any park roads at any time, with the exception of time needed to make repairs to the road ,for reasons stated earlier.

I am in favor of the upgrading , maintenance , repairs and additions to the historical buildings with the addition of fire supression systems. Also the repairs of monuments , markers, cannons. I am also in favor of removing over head power lines when felt necessary. I think the Wills house and the Train Station should be added to the park boundry's.

I am strongly opposed to the No new monuments in the park. I have always felt the monuments erected by the State of Ohiowere not of a proper material and did not , or were not , of an appropriate design to indicate the very significant actions involving several Ohio units in the battle. The recent addition of the Longstreet monument was long overdue but it is placed in an area that is some what hidden and not in an open space as are the other monuments. I also feel that since it was required that the monument be placed at ground level there will be considerable vandalism to this monument. It is not likely that many more monument request would be made to the park. If a monument is requested it should be considered and allowed to be decided by the people who own the park , this being the American taxpayers , as to if it should be erected or not. With the amount of monuments, markers and all else at the park now a few more would not make any difference. And would give credit where credit is due. Instead of portibiting any new monuments or markers it might be more appropriate to remove some monuments that are not appropriate or to remove the monuments or markers to units that were not even there.

c

I do not see that the park is necessary for horse back riding, runners, scout camps and other things of this nature. As to the removal of some of the rest rooms such as at the Pennsylvania Monument and in the Devils's Den area. I think that every visitor to the park knows that they were not there at the time of the battle. And their distraction from the battlefield is , in my opinion , minual if at all. For people who spend hours walking over the field could not have a rest room available they would have to find other alternatives which could lead to more damage to the park and other problems.

c The ban on future monumentation from all portions of the park is necessary in order to prevent incremental accruals and changes to Gettysburg's historic battle and commemorative landscapes. Concentrating additional memorials on the grounds of the new museum may complicate the disposition of that property in the future. The NPS encourages other activities or forums to commemorate battle actions and participants.

## COMMENTS

Page Four

The closing of some park roads to private vehicles and busses except in the case of where a Battlefield Guide or Park Ranger is present is sure to lead to a great uproar and fears that the publicis required to pay a fee to see some areas of the park that should be open to all. And with out paying a fee to a Licensed guide or being with a Ranger.

With regards to the Soldiers Cemetary I see no need for any great efforts in this area. Again probably no visitor would know or care as to if the trees in the cemetary were the type native to that area or not. As to the other trees and shrubs and other plants that are now in place. I am sure that when the original plan was laid out for the cemetary it was meant to be a place of peace and beauty. The trees and shrubs make it that. I am also sure that the soldiers who lay in the cemetary would if they could say to leave it as it is. A place of beauty, peace and tranquillity. When we were looking for our burial plot in the Evergreen Cemetary we passed up a number of cheaper plots and picked out the one we did because of the trees and shrubs that were near by and added to the beauty of the plot. If so much thought is given to the restoration of the cemetary and its appearance then I think the speakers platform should be removed.

Although I do enjoy being able to go to the top of the National Tower and view the battlefield from there I would not object to its removal. As to reconstructing missing towers. By this do you mean to rebuild the steel towers like the one of West Confederate Avenue that were once in place on Round Top and near the current visitors center. If this is so then would not these towers be in the way of the landscape as the National Tower??? While I always enjoyed climbing to the top of those towers they did distract from the battlefield.

d If the commemoration is to be restored why should it be restored to the appearance that it was between the period of 1895 and 1927??? I must also admit that with all the time I have spent in Gettysburg I do not know what the Historic Roller Building is.

Over the many years I have been coming to the Park I have not noticed many of the monuments where the ground around them was being eroded by an overuse of visitors. The only one I can think of off hand is the Armistead marker. While the ground is eroding around this marker I think that it is caused more by water then visitors. Perhaps if the marker was lowered to ground leval and surrounded by a small stone or cement walkway this would solve the problem in this area. It is of course understood that visitors to the park or monuments cause damage to the grass. I see no cure for this other then continued maintenance of the areas. To deny visitors access to the monuments, markers, the cannons and other areas of the park would be an injustice. These were all put there so that visitors could know what units did what or where certain actions took place. Not to be able to see these things up close would be defeating the purpose of their placement.

## RESPONSES

d All elements of landscape rehabilitation at Gettysburg NMP would be dependent upon completion of two major historic studies: a Cultural Landscape Report (CLR) and a National Historic Landmark (NHL) Nomination. These studies document and assess the history, development, significance, context, and integrity of the park's landscape, particularly in relation to the history and significance of the site itself. Initial drafts of both of these documents have been underway since 1995 and are the basis for the recommendations and mapping included in the draft GMP/EIS.

The NHL nomination identifies three unique but interwoven landscapes at Gettysburg that contribute to the park's national significance. These landscapes include the 1863 battlefield itself, the Soldiers' National Cemetery, and the park's post-battle commemorative system. The NHL nomination also lists those built and natural resources that contribute to the significance of the park and each of its three significant landscapes. The period of significance of the park embraces the years 1863 through 1927, an era that included not only the nationally significant Battle of Gettysburg but also those decades when the battle veterans themselves shaped the ultimate appearance of the battlefield and park. From 1895 through 1927 battle veterans personally designed and administered the park and battlefield. Their physical presence, personal vision, and design created a formal, park-like setting that elevated the perceived public appreciation for the historic site. The era of personal control by the battle veterans ended in 1927. It was in the years between 1895 and 1927 that many of the park's commemorative features were developed. It is for that reason that post-battle resources such as the observation towers, avenues, and monuments are not proposed for removal because they contribute to the nationally significant commemorative park landscape and are therefore important to preserve and rehabilitate. The landscape of this commemorative era best reflects the vision and accomplishments of the battle veterans in creating a national memorial to their Civil War experiences.

The Roller Building was developed by the War Department to house the steamrollers and other equipment used to maintain the park's avenues. It now houses the park's maintenance offices and shops. The Roller Building is located at the intersection of Taneytown Road and Pleasonton Avenue.

Page five

My son who is also devoted to the Gettysburg Battlefield has just brought up another very important point that deals with the No new monument plan. Almost every day there are new facts that come to light about the battle. If some new discovery is made available which is not noted by a monument or marker now on the field should this be ignored because you feel that there are enough monuments or markers on the field now???? I will admit that I am very prejudiced about Ohio's part in the battle. Once the area around the Home Sweet Home and Colt's park area is restored , assuming that it will be of course, I would like to see a more appropriate monument erected to the 8th. Ohio which would let visitors know the very important part they played in the battle and which would give a better understanding of the position of the 8th. Ohio. If this would take place I would be in favor of removing the present monuments or markers for the 8th. and replacing them with more appropriate and accurate ones. I would also like to see the monument to the 4th. Ohio on East Cemetary hill either restored to its original form or to be replaced with a new monument of the same style out of better material.

With all that is needed/wanted to be done at the park , not counting the new visitors center , the cost must be staggering. I feel that the highest things on the list of priorities should be the restoration and maintenance of the monuments, markers, cannons and such that are currently inplace along with the acquisition of historical land that is not presently owned by the park. As a member of the Friends of the Park I have some idea what we are trying to do in this area. But we can not do it allunfortunately with all the land that needs to be obtained. I think that great advances have been made but there is still much to be done and it needs to be done now. With all the growth springing up around Gettysburg much historical land is becoming lost. As an example the Letterman Hospital site.

I understand that the Park Service needs to cooperate with the townof Gettysburg but it is a two way street. The town needs to understand that were it not for the park there would be , to a large extent , no town. The town is largely supported by the visitors to the park. Yet the the merchants of the town and the area are more concerned with bringing in visitors to their places of business and charging high prices . An example of such is the Remembrance Day weekend in November when all the motels and businesses up their prices to take an advantage of the people who want to commemorate what happened at Gettysburg many years ago and honor the men who fought, bled and died here. I think the people of the town , and particularly the business area ,need to be more involved with assisting the park service in maintaining the park instead of turning the historical areas in money making areas.

I have written more then I had thought I would and think I better close this letter to you.

COMMENTS

RESPONSES

Page six.

In closing I would say that I believe you and your staff are doing your very best in a difficult situation. Having been a law enforcement officer for over 33 years I understand how hard it is to deal with the public sometimes. No matter what you do or how hard you try there will always be some , or many, who will disagree with you and will tell you how it should be done. As you no doubt can tell from this letter I possibly will be one of them.

I understand that the park is owned by the Federal Government and that you and your staff have been appointed as the custodians of the park. But in our country the people ARE the Government and so the people are really the owners of the park. And their thoughts and desires along with their needs should be given great consideration and thought. As President Lincoln said at Gettys- " of the people , by the people , for the people."

I sincerely wish you the very best in your efforts at Gettysburg. If I can be of any assistance to you and your staff I would be greatly honored to do so .

Very Truly Yours:

James Brown

James Brown

P.S. I just remembered something that has been on my mind for some time and while it has nothing to do with the problems at hand will mention it in this letter and have it done with.

In a recent visit to the park I was part of conducted tours given by licensed Battlefield Guides. I was amazed and outraged at the way two prominent officers who took part in the battle were ridiculed, made a part of crude humor and laughed at. And I am not the only one. I have seen in writing that others thought the same way. I do not think that this was an appropriate action for a Battlefield Guide and hope that any thing of this nature will not be conducted in such an unprofessional manner again. I have always thought that any man who served in combat was a hero and that any one who shed his blood for his country should be honored not a subject of crude jokes.

Dear Dr. Latschar,

It is important that the General Management Plan move forward.
We appreciate the opportunity to be heard.

Sincerely,

Name Mrs John Brownlee

Address

## Mrs. John Brownlee

## COMMENTS

Dear Mr. Latschar,
My husband and I are very pleased with the direction in which the negotiations for the new visitor Center & Museum seem to be headed.
Keep up the good work

and hopefully negotiations can be finalized soon.
Thank you,
Sharon & Gerry Brummer
FNPG. members

Gerald & Sharon Brummer

## RESPONSES

Sharon & Gerald Brummer

September 29, 1998

Dear Dr. Latschar,

As a member of the Friends of the National Parks at Gettysburg, I have received and carefully read my copy of the Draft General Management Plan and Environmental Impact Statement, and I would like to make a few comments.

The overarching comment that I would like to make is that I strongly support Alternative C, the proposed plan. It seems to be a very well-crafted compromise between Alternative B which, as its name suggests, seems to be far too minimal, and Alternative D which, although somewhat appealing to me in theory, seems unrealistically extreme. I simply do not see how economic and social realities could allow such an absolute restoration to the 1860's and/or 1890's. In short, Alternative C seems like an effective compromise between the extremes of too little and too much, and I would like to hereby urge and support its adoption.

In terms of some of the detailed actions that are proposed, I would just like to give a hearty "second" to several of them. First, I am excited to see the strengthening of the link to downtown Gettysburg, through a purchase and/or a NPS presence at the Wills House and the Train Station. Having lived in Gettysburg for three years as a student at the Lutheran Theological Seminary, I have a real desire to see the community as well as the park benefit together. Second, along with the restoration of historic orchards, fencing, woodlots, and fields, I am quite pleased to note that this will also result in the restoration of around 100 acres of wetlands in the Park. It is wonderful that these important but vanishing lands will benefit as the Park benefits. Third, in regard to the new Visitor Center, I am very pleased that the Cyclorama painting will finally be properly displayed and maintained, including the restoration of its intended diorama. I very much enjoyed visiting the Atlanta Cyclorama two years ago, with its diorama which gives an additional sense of depth and realism. This will make the Gettysburg Cyclorama an even more wonderful resource than it already is! Fourth, in regard to the new Visitor Center, I am pleased to see that Board of Directors of the new Museum Foundation will have such a broad composition, as described on p 97. This should be helpful in further securing public confidence. Finally, a question. . . Do I understand from looking at p 125 that the National Tower is at last to "bite the dust" under Alternative C? I am a bit confused about this, as some things I read seem to say that the National Tower's future is entirely unrelated to the GMP. In my seminary days, I often found myself fantasizing about how long it would take to cut that thing down, working at night with my hacksaw. If at all possible, get rid of it! a

Thank you very much for this opportunity to read and comment on the draft GMP and EIS. Amidst the inevitable storms of controversy, keep up the good work preserving (and improving) our premier Civil War treasure!

Very truly yours,

Tom Bruner

The Rev. Thomas G. Bruner, Jr.





## Thomas G. Bruner, Jr.

a It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, removal of the National Tower has been added to the final GMP/EIS.

## COMMENTS

August 29, 1998

Dr. John A. Latschar
Superintendent
GETTYSBURG NATIONAL MILITARY
PARK
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar:

Thank you for your letter of August 14, 1998 and a copy of the draft of the General Management Plan and Environmental Impact Statement for the Gettysburg National Military Park. I read the entire draft carefully and with much interest.

I enthusiastically support the plan and offer you my unqualified support. Please let me know how I may further support your fine work on behalf of the best interests of the Park. I trust in your judgement and that of your colleagues.

I will continue to financially support the Park. Your continued leadership is essential to the Park's success.

Thank you.

Sincerely yours,

TIMOTHY BUCHANAN
President

ACA INCORPORATED

## RESPONSES

### Timothy Buchanan

grant a. CADWALLADER

October 14, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar;

Thank you for including me on your advance mail list to receive the draft GMP. I am very much interested in what is happening in Gettysburg and will continue to make comments when I feel they are appropriate.

a It is not clear what you are asking us, the community, to do about your GMP. Should we select the best alternative from A, B, C and D? Should we comment on individual paragraphs and lines of the alternatives? Will the final GMP, as prepared by the Park, contain four alternatives or will it be narrowed to one alternative? Does the GMP go forward to a level of authority higher than that of Gettysburg National Military Park for selection of alternative, approval and adoption? It would be well to make known something of the process that is occurring and what the public impact on this process can be.

b As stated on page ii of the Summary, "If the planning process does not result in an acceptable proposal, the proposed visitor center facility will not go forward. "Acceptable" to who we might ask. The community? The Park? The Regional office? WASO? Politicians?

c To me the major flaw in your process seems to be that your solicitation for a visitor center, with or without proper authority, preceded the GMP draft. The matter of a visitor center is a yes or a no. There are no alternatives B, C, D for a visitor center.

Obviously, for the local community, the cornerstone of the GMP is the visitor center. For the general public the differences between alternatives B, C, and D are insignificant in comparison to the content of the visitor center facility. Mrs. Eckert doesn't want the artifacts in a privately owned building, even if it would be better for them. The

## Grant A. Cadwallader

a The process for responding to the document was explained in the "dear concerned citizen" letter that accompanied the draft and in public meetings held during the 60-day review period. NPS seeks comments on the issues and analysis contained in the draft, in order to be sure that it has adequately considered the concerns expressed by the public. The draft GMP/EIS will be finalized, and it will become the basis for the decision that the Regional Director of the Northeast Region of the National Park Service will make regarding the alternative to be implemented at Gettysburg National Military Park.

b The final decision regarding the selection of an alternative for implementation is made by the Regional Director, Northeast Region, National Park Service.

c Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new GMP/EIS to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the GMP/EIS. Working with the public, NPS established goals for the draft GMP (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated

## COMMENTS

restaurants, gift shops and tour givers don't want more competition than they already have, even though the new facility would draw more visitation to Gettysburg. Some, including me, think the Cyclorama is worth saving. The consensus seems to be that Gettysburg is not sympathetic with your plan to compromise Park Service goals and responsibility with private enterprise. If your plan is to twist the Government arm for money rather than to go public, it is a good plan and might just work.

The computer generated sketches recently published on the front page of the Gettysburg paper have alarmingly less interest or sensitivity to Gettysburg than the new Home Depot, Borders Books and Target in Frederick. Because this project may be done with private money is no reason to accept mall like architecture. It will be most interesting to see what starts coming off the drawing boards, or computer screens.

Sincerely yours,

Grant A. Cadwallader

cc: Director NPS, WASO

## RESPONSES

with the Gettysburg Campaign and its impact on the development of the nation.

- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

NORMA L. CALHOUN
CERTIFIED PUBLIC ACCOUNTANT

October 16, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

RE: Draft General Management Plan
and Environmental Impact Statement
August 1998

Dear Dr. Latschar:

The Draft General Management Plan displays the time, devotion, knowledge and creativity that you and your professional staff have invested in the future of the Park. The National Park Service apparently spent years developing the plan. The public needs more than 60 days to study this comprehensive plan fully. However, in accordance with the procedures for public comment, I am writing to express my concerns about selected provisions.

**A. Facilities for horse users**

On horse and foot are the ideal ways to tour the Park to appreciate the distances, landscape features and orientation of troop movements. Horses were important to the outcome of the Battle and have an important place in the interpretation and commemoration of the events. All horse people were relieved to hear you state in one of the public workshops that horses would not be eliminated from the Park. However, your assurance did not address several important issues.

1. **Private horse use:** The conclusions about visitor use and needs come from various surveys conducted in the visitor center, and possibly from information provided by concessionaires. Private horse owners parking at McMillan Woods are not represented in these surveys. Therefore, private horse use is drastically under-counted and our needs are not considered adequately. Have you implemented other methods to study these users and their needs? a

2. **Trail damage:** The NPS is justifiably concerned about damage caused by horses, but frequent users observe that little maintenance appears to be done. The GMP emphasizes damage by

## Norma L. Calhoun

a NPS used a variety of methods to gather information for developing the draft GMP/EIS between May 1997 and July 1998. These included numerous public workshops, meetings and hearings; and a series of newsletters mailed to 3,800 individuals and groups, offered as handouts and printed in large (poster) format our two main visitor centers and posted on our Web page. As reference documents, NPS also used a series of existing plans and documents including several visitor use surveys that had been conducted in the park over the past 10-15 years. While the most recent visitor use survey did not specifically target horse users, NPS did have input from horse users during development of the draft GMP/EIS.

## COMMENTS

Superintendent John Latschar
Draft General Management Plan, August 1998
October 16, 1998
Page 2

horses, but does not seem to account for the damage by the natural forces of erosion. The trail has been eroded near the Virginia Memorial for many years, but the erosion dramatically worsened during the floods of 1996.

The trail is closed seasonally to protect it, and it was closed for an extended time after the floods of June 1996. When it was reopened, parts were still too wet to ride. Following an incident when a horse slipped in a mud bog and was injured, several of my friends and I decided not to use the trail until conditions improved. This decision was made for the safety of our horses and ourselves, and to protect the trail from further damage.

Most riders view trails as valuable assets to be preserved and protected. Many of us in this region also ride the C&O Canal Towpath; we understand and accept that riding is not allowed when the towpath is soft due to wetness. The towpath may be closed one day and opened the next as conditions

b change. Have you considered implementing a similar policy?

Most riders want to be good stewards of the land, but we need help from the Park staff to monitor conditions and inform the personnel at the visitor center. Trail closures, whether

b (cont.) short or long term, should apply to commercial horse tours as well as to private users. Will you establish an information system so riders can call to verify whether the trail is open on a day-to-day basis?

3. **Trail maintenance:** As noted above, trail maintenance seems to be neglected. Is this because the NPS has insufficient funds and staff? According to the GMP, the projected cost to

c remove 15 miles of non-historic trails is $819,000; the projected cost to restore 9.8 miles of 1863 lanes is $1,223,040. Would it be a better use of funds to apply a small amount to rehabilitate and maintain the existing trails and spend the remainder for some other purpose?

4. **Horse trailer parking:** The GMP does not address where or if a parking area will be provided for horse trailers. Our primary needs for parking are as follows:

   a. Convenient access to the bridle trails without crossing a busy road (like Taneytown Road will be if the GMP is fully implemented).

   b. A relatively smooth, flat surface that will withstand the traffic of heavy vehicles and horse hooves, but not paved.

## RESPONSES

b It is not the intent of the draft GMP/EIS to deal with specific issues related to weather-caused closure of the horse trails. Park managers have discussed the possibility of closing trails seasonally because of poor conditions. At this time, no decision regarding this issue has been made and no policy has been established to institute seasonal closure of horse trails. NPS plans to establish a policy soon.

c The draft GMP/EIS notes that there are several reasons to consider relocating the existing trails. Chapter 3, Section 3.6.3, notes "that the almost 15 miles of non-historic trails cross some of the most historic territory of the park." To restore the cultural landscape, these trails would be relocated to historic farm lanes. In addition, relocation of trails to farm lanes would permit NPS to maintain them in better condition.

Superintendent John Latschar
Draft General Management Plan, August 1998
October 16, 1998
Page 3

c. Separation from other vehicles and traffic.

d. Wide lanes with adequate turning spaces.

Have you considered these needs?

Jonathan Lane, the NPS consultant who moderated the public workshops in Gettysburg during September 1998, said that trailer parking would probably be provided near the new visitor center. Under the GMP, visitor facilities and Park administration will be concentrated in an already congested area between Taneytown Road and Baltimore Pike. Why would you want to add horse trailers to this mix? Have you considered alternative sites that would put this traffic elsewhere in the Park, as it is now?

Barbara Platt told me that horse trailer parking might not be accommodated in the Park. I do not know whether she was voicing an opinion as a private citizen or from a position of knowledge in her capacity as vice-chair of the Park Advisory Commission. She said we could simply park at Artillery Ridge Campground and pay them "a couple of bucks." For the record, their fee is currently $5 per horse.

This raises the following questions:

d a. Does the NPS propose to implement a plan that provides for horse use of the Park but does not provide for parking horse trailers?

e b. Is this a way of imposing a fee for use by private horse owners?

c. If your solution is for us to rely on a private enterprise on private property, what provisions will be made to protect us when that enterprise discontinues operations and/or the property changes hands?

d. Will the NPS enforce reasonable limits on what they can charge?

I object strenuously to being forced to park outside the Park.

f 5. **Timing:** Assuming that the proposed GMP will be implemented, will the new bridle trails be opened and a new place for trailer parking be provided before permanently closing the existing trails and trailer parking?

d Site specifics for final horse trail locations and trailhead parking have not been determined at this time. NPS understands that if we are going to provide a horse trail system, we must provide parking. All aspects of the trail system and parking areas would be determined during the next level of planning.

e The draft GMP/EIS does not propose a fee on private horse use.

f The existing horse trails or the existing trailer parking areas would not be closed until the new trails and parking area are constructed. However, if existing trail conditions deteriorate to the point where park managers believe that resource damage is irreversible, sections of trails may be closed.

## COMMENTS

Superintendent John Latschar
Draft General Management Plan, August 1998
October 16, 1998
Page 4

g 6. **Use of licensed battlefield guides:** Will private horse users riding in small or large groups be required to hire a licensed battlefield guide to tour the Park on horseback? I earnestly hope that visitors on horseback, like visitors on foot or in private vehicles, will be able to conduct self-guided tours as they are now.

7. **Partnership:** On behalf of myself and various horse organizations of which I am a member, I offer assistance monitoring and maintaining the trails and with the detailed planning required to improve the facilities for horse use. The C&O Canal, Catoctin Mountain Park, and various Maryland state and county parks have sought and received trail maintenance assistance from TROT (Trail Riders of Today), Central Maryland Saddle Club and other horse organizations. Will you please call me at 717-337-0748 when the NPS needs help monitoring and maintaining the trails? May I be included in the detailed planning for implementing the horse trail provisions of the GMP? I could represent myself as a private individual, or I could serve as liaison to any or all of the following organizations: TROT, Central Maryland Saddle Club, Plum Run Hunt and the Chesapeake Plantation Walking Horse Club.

You told me that the owner of Artillery Ridge Campground and members of the Gettysburg Equestrian Historical Society would be given the opportunity to participate in the final planning. Will other individuals and representatives of other interested horse organizations be invited or allowed to participate? If so, how and when will these individuals and organizations be selected and notified?

h 8. **Bicycle use:** The GMP states that the new trails will be used for "pedestrian, horse and bicycle access." (Page 317 and elsewhere). On page 93, the GMP says: "Use the refurbished historic lanes as pedestrian and horse trails; use materials that are visually consistent with the landscape but suitable to withstand the expected traffic." The final point on page 93 reads: "Require use of paved avenues for bicyclists."

Please clarify this. Will the same trails be used by horses and bicycles? Bicycles are currently prohibited from using the existing trails. Generally, horse users are willing to share trails with other users, especially those built and maintained primarily for recreation and exercise. However, this is inconsistent with the Park's mission and purpose. Horses are the historic mode of transportation, not bicycles.

## RESPONSES

g Licensed battlefield guides are licensed by the National Park Service to provide a service to all visitors of the Gettysburg National Military Park. This service is provided for a fee and is not and would not be mandatory.

h The draft GMP/EIS would allow horse and pedestrians to share trails, but would require bicyclists to use the paved avenues.

i The draft GMP/EIS would allow horse and pedestrians to share trails, but would require bicyclists to use the paved avenues. No final plan for horse trails has been completed. The exact mileage of trails would not be determined until detailed planning is complete.

j You are correct in stating that trees assist in maintaining a viable ecosystem. Trees use primarily oxygen and carbon dioxide during their respiratory and photosynthetic processes. Carbon monoxide and ozone are the two substances that are of greatest concern for automobile emissions. The Gettysburg area complies with the National Ambient Air Quality Standards and all state air quality standards for carbon monoxide. However, it does not meet those standards and is a marginal non-attainment area for ozone. Ozone pollution is not unique to the Gettysburg area, but is of concern for the entire eastern United States. To be an attainment area for ozone, a site cannot exceed the standard more than three times over a three-year period. The source of ozone in the region is from vehicle emissions along the East Coast, and from major stationary sources of nitrogen oxide emissions in the Ohio River valley. The emissions from private vehicles driving through the park are minimal compared with the larger regional emissions. The Pennsylvania Department of Environmental Resources has concurred that actions within the park have minimal effects on regional air quality.

You are also correct in stating that trees help maintain good water quality. As part of the development of the draft GMP/EIS, a professional hydrologist was hired to evaluate the effects of tree removal on water quality for all the alternatives. He concluded that the proposed tree removal would have minimal effects on the quality and quantity of water that flows through the park (see draft GMP/EIS sections 4.5.2; 4.6.2; 4.7.2; Dewalle 1998). Deforestation without the replacement of vegetation would indeed decrease

Superintendent John Latschar
Draft General Management Plan, August 1998
October 16, 1998
Page 5

i **9. Total number of miles of horse trails in GNP Alternative C:** Please see page 317, Construction line items 7, 8 and 9. My initial reading lead me to believe that we would lose 15 miles and gain a total of 16.7 miles (Item 8: rehabilitate 6.9 miles; Item 9: restore 9.8 miles) of horse trails. Closer reading of other parts of the plan, especially page 93, lead me to ask: Exactly how many of these are miles are for horse use and how many miles will be exclusively for pedestrian use or paved bicycle path?

**B. Removal of 576-1015 acres of woods**

j As an individual interested in conservation, I deplore the plan to remove large tracts of woods. This can only be detrimental to air and water quality.

k The growth of woods may require visitors to use imagination and interpretative skills to visualize the parts of the battlefield in their minds' eyes, rather than literally seeing it. This does not detract from most visitors' experiences. The trees that have grown up since 1863 are the least of the modern intrusions on the battlefield.

The Park is not only a place to study and understand the Battle; it is also a place to contemplate and breath the fresh air of freedom. Please commit the necessary resources to fulfill the Park's mission without harming the environment and quality of life in and around the Park.

Thank you for addressing my comments and concerns. I look forward to touring the Park on horseback for many years to come. I hope I can be part of the partnership to preserve and protect this great national resource for future generations.

Very truly yours,

Norma L. Calhoun

cc: The Honorable Arlen Spector
The Honorable Rick Santorum
The Honorable William Goodling
The Honorable Craig Thomas
The Honorable Bruce Babbit
Mr. Donald J. Barry
Mr. Robert Stanton
Ms. Marie Rust





the water quality of the park. However, the action alternatives that call for trees to be removed also call for those sites to be replanted with grasses, low growing shrubs and herbaceous plants, or both. By maintaining the sites with vegetation and using best management practices to remove the trees and maintain the land, water quality concerns should be minimized.

k NPS visitor surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards will have a dramatic effect upon battlefield interpretation and help Gettysburg NMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. Park interpretive staff are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

## COMMENTS

Author: James Cameron at NP--INTERNET
Date: 10/16/98 3:16 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Draft General Management Plan (GMP)
---------- Message Contents

This is to express my SUPPORT for the proposed alternative selected by the park under the GMP. I regard this alternative as representing a balanced and reasonable approach to future management of the Gettysburg Battlefield.

I also SUPPORT the proposed new Visitor Center and Museum to be developed in partnership with the Gettysburg National Battlefield Museum Foundation. Absent highly unlikely government funding of this new complex, the proposed partnership represents a viable and beneficial approach to providing this much needed improvement. In addition, the concurrent removal of the existing Visitor Center and Cyclorama Center, and restoration of the area of Cemetery Hill they now occupy, will be a major step in preservation of the field.

Sincerely,

James L. Cameron
Founding Member, Nassau County (NY) Civil War Round Table
First Corps Founding Member, Friends of the National Parks at Gettysburg

## RESPONSES

### James L. Cameron

October 14, 1998

John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dr. Latschar:

This letter contains my comments concerning the Draft General Management Plan (GMP) for Gettysburg National Military Park.

Overall, I agree with, and support the park's proposed plan (Alternative C) as the preferred method for the future management of the park. I completely support the idea of returning the significant terrain features of the battlefield (woods, wood lots, orchards, fences, etc.) back to their 1863 appearance. It is vital that this terrain be restored for the general visitor to have any proper understanding of the battle.

As for the Visitor Center Proposal, the ideal solution would be for the Congress of the United States to recognize their responsibility and pay for the new facilities. Since that alternative is an impossibility, I feel the proposal presented is the best option for the park to obtain the facilities it needs. The park, however, must be extremely careful in how this plan is implemented, for there will only be one opportunity to obtain the new facility. If mistakes are made, the park will not only have to live with them for decades to come, but any failure will effect similar projects attempted by other National Park Service sites.

One aspect of the GMP which I completely support is the restriction placed on the erection of new monuments on the battlefield (Section 4.4.1, page 237). Not only are new monuments "modern intrusions in historic areas of the park" but they also devalue the original monuments. The value of the monuments lays in the fact that battle veterans built them. It was they who fought, suffered and sacrificed on these fields. The erection of new monuments simply confuses the park visitor, who naturally assumes all the memorials were placed by the veterans. The veterans themselves felt the field was adequately marked. Though new monuments are placed for good intentions, I feel they take away from the original memorials. There are other, less intrusive ways (i.e. waysides, etc.) to honor the men who fought here.

a My only specific disagreement with the GMP concerns the presence of the bridle trail on the park. I totally disagree with the GMP's treatment of the horse trail (Section 2.7 Table 5, p. 76, Section 2.7.3, pp. 92, 93, Section 3.6.3, p. 208 and Section 4.3.2, p. 225) which currently exists on the battlefield. The GMP openly admits that "Use of horse trails is causing severe soil erosion," (p. 225) that the trails have "created large ruts...several feet deep" and are "a special concern to resource managers" (p. 208). Yet no where does the GMP list the elimination of the horse trail as an management option.

## Eric A. Campbell

a In the early stages of developing the draft GMP/EIS, scoping meetings were held with the GMP team and with the public to determine the types of visitor use facilities that would be appropriate in the park. The overall consensus was that horse trails were an appropriate use and would therefore be incorporated in all GMP alternatives. However, NPS believes that the trails should be relocated from sensitive resource areas to minimize resource damage and provide for visitor enjoyment.

## COMMENTS

Though the plan calls for relocating the trail to historic lanes and stabilizing it to prevent future damage, I believe this solution is unacceptable for several reasons. Most importantly, it takes money to complete the suggested improvements. Currently the park does not have such funds, so any improvements, if made, will be long delayed While relocation and stabilization will mitigate the damage for those riders who stay on the designated trails, it can not address the issue of horseback riders who stray off the trails. Allowing the presence of horses on the battlefield will continue to cause damage to resources off the trails.

b Since it is obvious that the bridle trails will continue to exist, I urge the park management to heed its own words concerning this subject. In Section 2.7.3 (Visitor Uses and Facilities, page 93) under "range of options" the GMP states:

*-"Establish carrying capacities for the most overused sites...."*

This alternative is an absolute necessity if the damage caused by horses is to be controlled. Nearly all of the damage to the bridle trails is currently being caused by the commercially operated tours of the National Riding Stables. Their horse backs tours are an excellent example of the unrestricted use of the battlefield for commercial gain. Even if the trails are stabilized, damage will continue if unrestricted commercial use of the bridle trail continues. Along this same line, what will prevent even more commercial horseback tours from using the field in the future. If one commercial operation can cause this much damage, imagine what two, three or even more such operations would do to the field.

*-"Limit use of some sites while repairs are completed, or seasonally to prevent erosion and other problems."*

Though this policy is currently in effect, the park does not enforce it. Last spring was an excellent example, when excessively heavy rains made the bridle trail extremely muddy and dangerous to use. Despite these conditions the trail remained open which accelerated damage to the resource.

The park management has talked for years about protecting the resource. The bridle trail effects the most important resource of all, the battlefield itself. Despite the obvious, and in some cases irreparable damage caused by horseback riders, this problem has been allowed to continue, and even worsen, over the last several years. With the completion of the GMP, work should begin immediately in this area.

Many of these same concerns hold true for damage caused by heavy pedestrian traffic in the more popular areas of the field (i.e. Little Round Top, Devil's Den, High Water Mark, Eternal Peace Light, etc). While corrective measures (i.e. restricting excess or temporary closures) might not be that popular with the public, I feel the Park Service's most important responsibility is protection of the resource. If that means closing off an area for a year or more, so be it. The park and its resources need to be managed for long term protection. Hopefully the battlefield will be here long after all of us are gone.

c As a minor aside to this issue, the GMP (Section 2.7.3, page 95, Section 4.4.5, page 248) lists possible corrective measures concerning resource damage caused by cars driving off the roads. One suggestion is to reconstruct the historic gutters along the avenues to prevent cars from parking off the road. I believe this solution will not work, as I have personally witnessed numerous vehicles along Hancock Avenue pull off the road by going over the gutter and parking their right wheels in the grass. I agree that some corrective measure must be found, but believe gutters would only be an expensive measure which would not work.

## RESPONSES

b It is not the intent of the draft GMP/EIS to deal with specific issues related to weather-caused closure of the horse trails. Park managers have discussed the possibility of closing trails seasonally because of poor conditions. At this time, no decision regarding this issue has been made and no policy has been established to institute seasonal closure of horse trails. NPS plans to

c Although some cars pull through and across existing bituminous gutters along avenues, the majority of vehicles do not. Guttering, where it is necessary or historic, would be designed to provide the most effective barrier to off-road parking. The installation of gutters along park avenues did not originally serve this purpose of vehicular restriction. The historic purpose of the guttering was to control and channel drainage from the avenue surfaces. In some instances, guttering would be installed as a means to meet that same requirement. It would most likely be through a combination of structural devices as described on page 248 of the draft GMP/EIS, as well as an educational program, that NPS would confront this resource issue.

Overall, I feel the GMP is a good plan that will lead Gettysburg National Military Park in the right direction as it approaches the 21st century and I urge the plan to be adopted and implemented by the National Park Service.

Sincerely,

Eric A. Campbell

## COMMENTS

Author: at NP--INTERNET
Date: 10/18/98 11:15 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gen'l Management Plan Public Comment
---------- Message Contents

Dear Dr. Latschar:

I wanted to take this opportunity at the close of public comment on the GMP to express my support for "Alternative C" as the most approriate course of action concerning the long term future of the Park.

Beyond that decision, I wanted to express my thanks to you and your team for the outstanding work that has been done to document and inform Americans on the future of the park. I was able to attend the public workshop on September 7th while on business in PA. and was impressed with both the commitment and dedication of your staff to the task of having to debate the Alternatives based on what I felt was a crowd made up of self indulgent, narrow minded people only interested in their ability to continue with a use of the park serving only themselves. I thank you for your patience with this lot.

The park has always held a special place to me and I visit whenever able, and I feel strongly as a 1st Corps Friend of the park that preservation and historical interpretation should always be the priority. I want my children and grandchildren to always be able to enjoy the vista from Little Round Top or the majesty of Cemetary Ridge.

You and your staff have done good work here and I thank you for having the courage to stand up and do the right thing. You Sir, are a Hero to the American People.

Thank you and good luck.

Gordon Campbell

## RESPONSES

### Gordon Campbell

| COMMENTS | RESPONSES |
| --- | --- |
| Mr. Brian E. Carey<br><br>Dear Supt.<br><br>I am in support of the preferred alternative for the General Mgmt. Plan at Gettysburg N.M.P. The proposals to rehabilitate the battlefields & the joint partnership venture for the museum complex sound exciting.<br><br>Brian Carey | Brian Carey |

## COMMENTS

Denise Carper

October 16, 1998

The GMP/EIS proposed by the GNMP, which identifies Alternative C as the preferred plan is a reasonable "work in progress" outline. Thanks in large part to the tremendous amount of effort put forth by a great number of people, there is an opportunity to enhance and enrich the future Gettysburg visitors' experience far beyond what currently exists. This objective, along with the obligation to preserve the artifacts and battlefield, should be of paramount importance to all of us who care about the GNMP. Instead, the recent public forums have subjected us all to increasingly belligerent expressions of anger and mistrust directed at the NPS and its representatives. Some of the speakers have eloquently stated genuine and legitimate concerns about the GMP/EIS and I have some of the same concerns. But others who are still distressed by bygone elements of dissension with past NPS officials are carrying these issues and attitudes forward into the present discussion. They have no relevance here. Still others blatantly do not like the current NPS officials and are unwillingly to support any attempt at change if their wishes are not unconditionally incorporated into the plan. Let's be honest enough to acknowledge that the real barriers here are the clash of egos and the struggle for control among a few influential citizens. It was amazing to me to hear a speaker at the GNMPAC meeting last evening comment on the perceived arrogance of the Park Service officials here at Gettysburg. I have attended most of the meetings offered by the NPS for public input and information as well as the Gettysburg Borough Council meetings when the GMP has been discussed. Anyone listening objectively must recognize that community fragments continue to bash the Superintendent and others on a purely personal level because *they* have been unsuccessful in *their* attempt to dictate NPS agendum. Worse, these instances have become increasingly nasty, personal, and counter-productive. By continually attempting to circumvent the process already in place which, if used effectively, would allow for meaningful dialog, there can be no effective exchange of ideas. But they are not interested in discussions—only in cancellation of the exemplary work that has been done by the NPS. Hopefully, their appeals to "higher authorities" based upon motivations that are at best, questionable will be discounted.

How did we get to this point? At the center of the GMP, owing to Congress' unwillingness to provide the funds to ensure the viability of the GNMP and recognizing the need to preserve the artifacts and battlefield, is the choice of the Kinsley proposal. If you are unhappy about the RFP process or its resulting selection of Kinsley, blame Congress not the NPS. If you think that it is preferable to renovate the existing facilities that are on land where soldiers struggled and died rather than behind these areas of combat, I suggest that you think about what option the soldier would choose. I've even heard a comment that the visitor's center should remain because Civil War Vets once walked its floors. Is this fact somehow of greater relevance than the fact that the land it sits on is actually where Civil War soldiers died? Restoring this hallowed land is the right thing to do.

If you are unhappy with the building design or cafeteria size, reasonable considerations can still be suggested. Personally, I am satisfied with the commercial reductions that have already been made. If you feel that too many trees are to be eliminated, perhaps the determining factor of whether they stay or go could be according to their relevance to the visual telling of the battle story and not necessarily because they were not actually present in 1863. Also, perhaps the timetable needs to be expanded for minimal impact on the surrounding environment. And a maintenance plan is also a necessity.

If your concern is for handicap access to the National Cemetery and Pickett's Charge, perhaps both could be solved by designating handicapped-only parking along the Baltimore Street entrance to the Cemetery and the spots closest to the High Water Mark. The meters on Baltimore Street could be changed from 12 hours to 2 hours to encourage turnover and the handicapped-only designation should be diligently enforced. Also, the idea to make the area of the current employee parking lot available to only Senior Citizens or those with medical challenges should be considered.

If your concern is for the merchants on Steinwehr Ave., perhaps the Park could put informational "pamphlet boards" inside and outside of the new facility. This would conveniently make options available to tourists about Gettysburg's restaurants and other attractions. If you are concerned that tourists will no longer want to walk from the new facility to Steinwehr or downtown, consider that a number of these same tourists also visit Hersheypark and don't find walking there to be a challenge.

## RESPONSES

### Denise Carper

## COMMENTS

If your are concerned about unacceptable commercial development along the Baltimore Pike, take those concerns to the appropriate local officials as well as the NPS. The NPS did not develop Steinwehr Ave nor does it have any direct control over the development of the Baltimore Pike corridor. There are concerns that road conditions due to increased traffic will deteriorate along this road but this is a community issue as well as the NPS and must be mutually addressed. Cooperative efforts will find acceptable solutions. There is a price to be paid for progress. But there is a higher price to be paid for dormancy.

The fact that issues remain and that there is still work to be done should not invalidate the GMP/EIS. Unquestionably, we all perceive the consequences of GMP/EIS differently. But these differences should not blur the fact that what has been proposed will have more positive than negative results for the GNMP, the Gettysburg Borough, the Gettysburg Merchants, and the Gettysburg Visitor. The proposed museum/visitor's center, which sufficiently satisfies the goals of preserving the artifacts and battlefield while also enhancing the visitor's experience, should move forward along with further discussions on these and other remaining issues. Communications between the NPS and the Borough concerning increased Park Service presence and involvement in the downtown should also continue. Reasonable people willing to offer responsible leadership and rational compromises will make the difference. I believe that the NPS is up to this challenge. It is my hope that the Gettysburg inhabitants are as well

## RESPONSES

## COMMENTS

Dear Dr. Latschar,

AS MEMBERS OF THE FNPG, MY WIFE AND ARE WELL AWARE OF THE NEW GMP AND THE NEED FOR A NEW VISITOR CENTER/MUSEUM. YOU HAVE OUR SUPPORT, WILL COMMENT FURTHER IN WRITING AND WILL SUPPORT THE FUND RAISING FOR IMPLEMENTATION OF THE GMP.

Sincerely,

Name MARK & BARBARA CHAMBERLAIN

Address

## RESPONSES

**Mark & Barbara Chamberlain**

October 16, 1998

John Latschar
PhD, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

I value the National Park Service's mission of protecting and preserving the significant cultural resources of the Gettysburg National Military Park However, I feel that its proposed plan of deforestation in an effort to reconstruct the landscape to resemble 1863 conditions would have significant impacts on water resources and stormwater management in Adams County.

a Currently the Gettysburg area has experienced flooding problems due to inadequate stormwater management. I believe that the deforestation being proposed would have significant impacts on both water resources and stormwater management and would contribute to flooding problems

Honoring, preserving and protecting our past is important, but not at the expense of destroying present and future water resources which are essential to our daily lives

I would like the National Park Service to re-evaluate the impacts of the proposed deforestation of the Gettysburg National Military Park and to seek alternatives that would not result in any adverse impacts on our environmental resources

Sincerely yours,

Phyllis Chant

Phyllis Chant

Concerned Citizen of Adams County

## Phyllis Chant

a As part of the development of the draft GMP/EIS, a professional hydrologist was hired to evaluate the effects of tree removal on stream flow for all the alternatives. His report indicated that total annual stream flow would increase between 5-8% and peak streamflow would increase between 2-3% for the action alternatives (see draft GMP/EIS sections 4.5.2; 4.6.2; 4.7.2; Dewalle 1998). Deforestation without the replacement of vegetation would indeed contribute to flooding problems. However, the action alternatives that call for trees to be removed also call for those sites to be replanted with grasses, low growing shrubs and/or herbaceous plants. By maintaining sites with vegetation, flooding concerns should be minimized.

## COMMENTS

Author: "Archie and/or Debbee Clark" at NP--INTERNET
Date: 10/14/98 1:45 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: GMP
---------- Message Contents

Mr. Latscher,

Just for the record, I am opposed to any commercial development within the boundary of Gettysburg National Military Park. I get the impression that public comment is not really wanted nor heeded, but I have faith that those of us who do not want to see sacred ground desecrated shall prevail.

Debbee Clark

## RESPONSES

### Debbee Clark

## E. L. Clark

Author: at NP--INTERNET
Date: 10/13/98 5:59 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
TO: GTT_Superintendent@nps.gov at NP--INTERNET
Subject: Gettysburg general management plan
---------- Message Contents

Hello,

Thank You, for sending me the Environmental Impact Statement and General Management Plan Draft.

I feel due to the historical significance of this battlefield and in memory of the men that died on both sides, if the monies are available without damaging the care of other parks in the NPS that Alternative D would be my selection for the course of action.

If the monies are not available or spending so much on this Hallowed Ground would diminish concerns of other parks, I would be in favor in decreasing order of Alternative C, followed below by Alternative B, and lastly by the Do Nothing Alternative A

Thank You for the detailed statement. I enjoyed it and it's pictures immensely

Sincerely,
Concerned Citizen
E. L. Clark

## COMMENTS

Dear Dr. John Latschar, August 15, 1998

Mr. Latschar, on behalf of my family and I, we would like to express our deepest concerns for the safety and welfare of the Gettysburg National Battlefield and it's latest heart-breaking issues.

Please let me say our emotions clearly, simply, and angerly to you. "We simply ***do not*** accept any more destructive endangerment to our *very* historic fields of honor. How many more gift shops, theartes, parking lots, cafeterias, over congestion on other parts of the battlefield to and from these excess buildings, how much must one battlefield require?

In addition, as a major preservationist and re-enactor, as with many more battlefield defenders of our honored but few battlefields, we can requruit an "army" to stop these invaders from our soil once again to defend "another Round Top." I have now voiced my negative opinions for this development in the park's boundaries, but now I pray that you sir might too voice your opinion against these actions before all Gettysburg will evolve into pavement and - history.

Sincerely,

Joseph and Brenda Compher

## RESPONSES

### Joseph and Brenda Compher

Author: Joseph Costello
Date: 9/29/98 1:41 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: General Management Plan
---------- Message Contents ------

Dear Superintendent Latschar:

My neighbor gave me his copy of the General Management Plan the other day. While I have not read the entire plan, I did find the parts I have covered to be most interesting. I was especially interested in the public private partnership to construct a new visitors' center. From the press I was picturing something along the lines of a mall that happened to have a NPS museum in it. I was much relieved to get the details from the plan. I want to let you know I support the concept of the public private partnership as presented in the plan. To be quite honest, I wonder if there will be enough revenues generated in the new center to pay for its operations, debt service, and still allow Eastern National and the foundation to make contributions to the park.

I do have some areas of concern with the plan. It appears that deterioration of facilities and grounds is a major concern. Hence, the capital outlays for restoration and rehabilitation. I must agree. My concern is that the increase of maintenance positions is much lower than the increase in interpretation and visitors services. After all this capital outlay I must wonder if the park will be able to maintain itself. Perhaps the increased number of positions should not be so lopsided to the interpretative side.

a

I am not an expert in agriculture. Therefore this observation may or may not be a valid one. The plan *does* note that maintaining much of the agricultural acres in the park costs the park service very little. If farmers are forced to return to 1863 farming methods, you may find the park being forced to pay some farmer(s) to keep those fields in accordance with those methods. While I can understand the desire for exact historical accuracy. If the farming becomes non-profitable, then the park will have to spread scare resources even thinner. I would rather have corn and wheat grown according to modern standards than have no crops at all.

b

The plan makes some comments about the deteriorating condition of the painting at the cyclorama center. I can not find a line item in the proposed plans to do restoration work on the painting. Did I miss it? Is it included with some budget? Or is restoration not part of the plan?

c

On the whole I endorse you plan. Please feel free to enter my comments into your public comments file.

Respectfully,

Joseph J. Costello

## Joseph J. Costello

a Visitors to Gettysburg NMP come to learn about the battle. Additional interpretive staff is necessary to tell the complete story and to reach as many visitors as possible. Interpretive ranger programs were only available to 88,000 of the park's 1.8 million visitors in 1997. Additional staff requirements were calculated by estimating the time needed to accomplish the actions listed for each prescription. With fewer dollars available, parks are depending on volunteers to assist them with many of the maintenance functions. In the future, as at present, the park would continue to utilize volunteers and other partnerships to accomplish many of its maintenance tasks.

b In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should only have a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed, and should therefore result in stable farm income.

c An allowance for restoration of the cyclorama painting is included in the plan, although the actual costs of restoration are not yet known. The cost of restoration is included in the detailed cost estimates for the visitor center/museum complex, which were not included in the draft GMP/EIS.

## COMMENTS

**Dear Dr. Latschar,**

I found your comments regarding GNMP which were published recently in the FNPC Newsletter very interesting and informative. I was happy to hear that the long overdue increase in funding has finally come through. I hope that you will take advantage of this opportunity to move forward on the General Management Plan.

Sincerely,

Name George B. Crafort

Address

## RESPONSES

**George B. Crafort**

## Douglas R. Cubbison

October 17, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar:

Thank you for offering me the opportunity to comment upon the Draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for Gettysburg National Military Park, Gettysburg, Pennsylvania (GNMP), dated August 1998.

First, let me state my professional qualifications to review this document. I am a professional historian with close ties to the Gettysburg community. My uncle has been a resident of Adams County for over 25 years, my grandmother resided in Gettysburg from 1989 until her death in 1996 and my mother was a resident of Gettysburg from 1989 to February of this year. I am known for my expertise in American History, the American Civil War, environmental and historic preservation issues. I received my B. A. cum laude from Indiana University of Pennsylvania, Indiana, Pennsylvania in 1980 with a minor in Anthropology, and was also a Distinguished Military Graduate of the U. S. Army Reserve Officers Training Course program at that school. I have ten years experience as an active duty and reserve combat arms Commissioned Officer in the U. S. Army. I have received professional training in cultural resource management and National Historic Preservation Act (NHPA) compliance from the Advisory Council of Historic Preservation. I have over eight years experience advising government, state, and local agencies in compliance with the NHPA and cultural resource management. I am a life member of the National Rifle Association. I am a life member of the Association for the Preservation of Civil War Sites, and have been a member of the Gettysburg Battlefield Protection Association since 1986. I am the author of a professional historic article entitled "Colonel George A. Cobham, Commander of the Second Brigade, White Star Division at Culp's Hill" published in *Gettysburg Magazine* on that colonel's role in the Battle of Gettysburg. I presently am the President and Owner of White Star Consulting, a small business, historic preservation firm located in Mount Pleasant, Tennessee. I have served in this position since the organization of White Star in July, 1993. Among our clients are the National Park Service, Tennessee Historical Commission, Mississippi Department of Archives and History, Association for the Preservation of Civil War Sites, and numerous others. I have given hundreds of professional programs on various aspects of American History at Civil War round tables, national parks, state parks and other historic sites from Canada to Florida, and from Massachusetts to Oklahoma.

In addition to this focused historic experience, I have over 8 years experience in the preparation of National Environmental Policy Act (NEPA) compliance documents. I have received professional training on the preparation of NEPA documents, have been a principal team member for a number of Environmental Impact Statements (EIS), have been a team leader responsible for the preparation of Environmental Assessments (EA), and have assisted in the preparation of and/or reviewed literally hundreds of NEPA

## COMMENTS

documents from Records of Environmental Consideration (REC) to Records of Decision (ROD) for EISs.

During my review of this GMP/EIS I found very few typographical errors, and made very few editorial comments. I have a reputation as a meticulous and painstaking reviewer of NEPA documents. For me to find so few discrepancies suggests that both you and your staff have devoted a great deal of time and attention to detail in the preparation of this document. I commend you for your and your team for their efforts to produce a quality GMP/EIS.

Based upon my years of professional experience, I have numerous comments on this document. Individual comments are provided as a separate enclosure to this cover letter. The sheer quantity of my comments (31 pages on a 300 page document) should validate that this document is not ready to proceed to a Final Version. I strongly urge that a Second Draft or Final Draft of the GNMP GMP/EIS be prepared following the conclusion of the public comment period. As this August, 1998 Draft GMP/EIS has been presented, it is inadequate for a decision maker to issue a Record Of Decision (ROD) for this government proposed action.

My single greatest concern rests with the formulation of the alternatives for this EIS. In fact, based upon a careful perusal of this document, there are two separate and distinctive proposed actions. The first involves implementation of a public/private partnership with the Kinsley Corporation for the construction of a new Visitors Center, the subsequent demolition of the extant Cyclorama Center and Visitors Center, and the restoration of the Ziegler's Grove area. The second involves a variety of land management issues, including enhanced interpretation, significant changes to the agricultural management practices at GNMP, restoration (to various degrees) of the 1863 landscape at GNMP, and actions at the National Cemetery. There is no relationship or linkage between these two efforts. The Visitors Center could be built under the public/private partnership program with the Kinsley Corporation without implementation of the Enhanced Landscape and Interpretation proposals. At the same time, the Enhanced Landscape and Interpretation actions can be implemented by GNMP, without the construction of the proposed GNMP/Kinsley Visitors Center.

a Under the formulation of alternatives, I am also concerned that there is no presentation of an intermediate resolution of the purpose and need for this action. As I could derive from Chapter One of this document, the purpose and need for the GNMP/Kinsley Visitors Center include:

- deterioration of GNMP's artifact collection (primarily the Rosenstal Collection)
- deterioration and lack of public availability of GNMP's archival collection
- dispersion of GNMP's staff in different, scattered facilities
- deterioration and improper environmental conditions for the national treasure of the Cyclorama
- expanded and enhanced visitor facilities
- expanded and enhanced interpretation.

The proposed resolution to these issues is the construction of a $40,000,000 Visitors Center, as presented in Alternative B. In point of fact, although the proposed GNMP/Kinsley Visitor Center does respond to these issues, there are other less-expansive and less-expensive options available that would resolve these concerns. However, the

## RESPONSES

a The National Parks and Recreation Act of 1978 requires that GMPs, among other things, address the preservation of park resources and the types and general intensities of development. Therefore, GMPs generally contain information regarding both preservation of resources and location and size of visitor facilities.

Between August 1995 and April 1996, NPS prepared a *Draft Development Concept Plan/Environmental Assessment* (DCP) to explore alternatives for the needed facilities. Development Concept Plans are tools that NPS uses to solve facility concerns. The DCP included four alternative concepts for the new facilities: (a) a no action alternative, (b) building a collections and archival storage facility and leaving the Cyclorama and Visitor Centers as they are; (c) building a new Cyclorama building combined with collections and archival storage and renovating the existing Visitor Center in place, and (d) building a new combined facility incorporating all these uses. The DCP was put out for public review for 45 days in April 1996. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. The majority of the public comments which were received agreed with the NPS's choice of Alternative D, building a new combined facility in a new location.

Based upon that public response, NPS released a Request for Proposals (RFP) in December 1996, seeking a partner or partners to assist in the accomplishment of the DCP's preferred alternative. The RPF process resulted in the selection of a proposal for negotiation in November 1997, and a revised proposal in June 1998. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal.

Scoping for the park's new General Management Plan and Environment Impact Statement (GMP/EIS) had been initiated in April 1997. Based on the public input received on the DCP, the draft GMP/EIS and other public comment, the NPS determined that it was desirable to incorporate the issues of visitor use and interpretation at the new museum complex as an element of the forthcoming draft GMP/EIS.

GMP/EIS does not provide any alternatives except this massive project. I recommend that a Second Draft of this GMP/EIS be prepared, with two sets of alternatives:

Alternative One- Enhanced Landscape and Interpretation of Gettysburg Battlefield
- A- No Action
- B- Minimum Required Actions
- C- Rehabilitation of Landscapes Significant to the Battle...
- D- Maximum Park Rehabilitation.

This would contain all elements of the August, 1998 Draft GNMP GMP/EIS, with the exception of those that involve the GNMP/Kinsley Visitor Center. The information provided in Table 3, p. 61 of the GNMP GMP/EIS would be an integral contributor to the formulation of this alternative.

Alternative Two- Enhanced Visitor Facilities at Gettysburg Battlefield
- A- No Action
- B- Minimum Required Actions - This alternative would provide the minimum required actions to address the purpose and need for enhanced visitor facilities. Included within this alternative would be:
  - preservation, curation and maintenance actions at the Cyclorama Center to foster protection of cyclorama painting
  - enhanced use of interpretative potential of Cyclorama Center, transfer of Eisenhower NHS activities to Cyclorama Center
  - enhanced interpretation at extant Visitor Center
  - Construction of limited facility for artifacts and archives of GNMP
  - Construction of limited facility for consolidated GNMP staff and headquarters.
- C- New Cyclorama Center - This alternative would entail all actions from Alternative 2-B, with the addition of the removal of the extant Cyclorama Center, and establishment of a new Cyclorama Center on a less historically significant and intrusive site within the GNMP/Eisenhower National Historic Site (NHS) boundaries.
- D- New Visitor Center Complex - This alternative would include the establishment of the full GNMP/Kinsley Visitor Center Complex as proposed in the August, 1998 Draft GNMP GMP/EIS.

This would permit a full range of interpretive and preservation alternatives to be evaluated at GNMP, rather than the alternatives presented in the current GMP/EIS which are a "all or nothing" scenario.

b There is a very compelling reason why such an analytical scenario would be beneficial to GNMP. Pages 97-98 of the GNMP/EIS, "Funding Requirements and Fundraising" notes that $39.3 million must be raised to acquire the land and build the GNMP/Kinsley Visitor Center. It also notes that "No construction of any part of the facility would occur until all funds are secured." This GMP/EIS contains no discussion of what will happen if sufficient funds (nearly $40,000,000) are not raised. I would suggest that performing environmental analysis of a range of new visitor and park facilities would permit flexibility if some funds are raised, but not the entire amount. In such circumstances, GNMP could simply choose to implement another alternative that requires less funding than the full

b The draft GMP/EIS describes the type, use, and benefits of a proposed new visitor center/museum complex, and suggests that the proposed partnership between NPS and the Gettysburg National Battlefield Museum Foundation is the most feasible method of accomplishing those goals. However, if the Foundation is unable to secure sufficient funds to construct the complex, it would not change the overall goals identified in the draft GMP/EIS. In that case, NPS would pursue all other feasible funding alternatives to achieve its goals.

## COMMENTS

GNMP/Kinsley Visitor Center as proposed in Alternative B of this document, without having to perform additional environmental analysis.

c As a component to Alternative B of this GMP/EIS; and as a component of Alternative 2-D of my suggested alternative, I would like to suggest the inclusion of a specific proponent. Specifically, I would like to see the original Rosensteel Collection Building be retained -that is, the 1920s Rosensteel family structure, as what it was -- one of the earliest museums of the Gettysburg battlefield. That is, rather than tear the entire structure down as suggested by Alternative B of this draft GMP/EIS, keep the earliest portion of the building (removing later additions), and use it to display not only the Rosensteel Collection -- but to pay homage to all those veterans, North and South, who came back to Gettysburg. Tell the story of the veterans period, veterans re-unions, battlefield as training camp in WWI, the early Battlefield Guides, the history of the park roads, monumentation, German POWs in World War II, stories of the veterans buried at the National Cemetery, battlefield controversies over time, etc. In short, tell this component of the story of the Gettysburg battlefield - that is, those events after 1863.

Another concern is that this GMP/EIS contains insufficient detailed information to make informed decisions on those portions concerning the construction of the proposed GNMP/Kinsley Visitors Center, and that the environmental analysis of the GNMP/Kinsley Visitor Center is insufficient to make an informed decision upon.

d The proposed GNMP/Kinsley Visitor Center constitutes the single largest and most significant change to the Gettysburg battlefield and community since the battle itself. Therefore, I am alarmed with the inadequate description and definition of this proposal. The following minimal information is mandatory for an accurate and comprehensive evaluation of its environmental impacts:

- height of building, at various points
- architectural style of building
- construction materials of the building
- engineering details of parking area (size, materials, drainage)
- sketch or drawing of utilization of all forty areas of new complex
- simplified blueprints of visitor center complex, with critical functional areas showing relationship between approximate square footage specified in Table 7
- management, operation and details of Food Service at new V. C. (beyond p. 89)
- how many structures and buildings at complex
- specifics of entrance/exit (location, width, lanes, traffic signals, etc.)
- specifics of power, potable water, sewage, natural gas and other utility requirements
- total no. of employees.

Until such information is presented to the public, and is reviewed in accordance with NEPA, I do not see how a decision-maker can issue a ROD for this proposed action.

e One significant impact from the proposed private/partnership GNMP/Kinsley Visitor Center is the impact that it will have on battlefield preservation efforts throughout the nation. According to 40 CFR § 1508.8 defines indirect effects as "Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." The statement provided on p. 97, "Funding Requirements and Fundraising" states that "The Foundation would raise no less [my emphasis] than $27.36

## RESPONSES

c The alternative of retaining all or a portion of the current visitor center building was considered in the 1996 Development Concept Plan/Environmental Assessment for Collections Storage, Museum and Visitor Center Facilities. However, it was not the preferred alternative (for either NPS or the public), since retaining the visitor center in its current location violates one of the primary legislative purposes of the park: to preserve the significant topographical, natural and cultural features that were significant to the outcome of the Battle of Gettysburg (draft GMP, p. 5). In addition, there would be significant costs required to correct the numerous and serious infrastructure, life-safety, and handicap accessibility deficiencies of the current building.

d The purpose of a GMP is to define the basic philosophy of park management and provide broad guidance to park managers, by setting direction for resource preservation and visitor use in consultation with the public (p. 2, draft GMP). Throughout the development of this draft GMP/EIS, considerable public discussion took place concerning the purpose and benefits of the proposed museum complex, and the appropriate visitor services and public uses of the building (as well as the anticipated spaces allocated for such services and uses). However, GMPs are not intended to provide precise design details of proposed developments.

Actual design of the proposed museum complex would not begin until after NPS has selected an alternative, the GMP process is complete and the NPS signs a formal agreement with the Gettysburg National Battlefield Museum Foundation. At that time, in accordance with the Letter of Intent, the Foundation would be responsible for providing a design concept for "facilities that respect their location and the historic vernacular building tradition of the area; respond sympathetically to the natural landscape features of the site; and become a positive catalyst for preservation and a lever for sensitive development of surrounding areas. (draft GMP/EIS, p. 327)

e Neither the fund-raising experts consulted by the Gettysburg National Battlefield Museum Foundation, nor the major preservation and conservation groups consulted by the NPS, agree with this opinion. Fundraising for "bricks and mortar" projects such as the proposed museum complex would not normally compete with funds available for "land preservation" projects.

## COMMENTS

through grants and non-profit fundraising." The Civil War community is already woefully under-funded, and is struggling with the preservation of thousands of Civil War sites throughout the nation. During testimony presented to the Subcommittee on National Parks, Historic Preservation and Recreation of the U. S. Senate Energy and National Resources Committee on February 24, 1998, Mr. Dennis Frye, then-President of the Association for the Preservation of Civil War Sites (APCWS) and a personal friend of mine, stated it best, "Fundraising half the necessary capital from the private sector is unrealistic and unjustified. The history community cannot support nor afford drainage of $20-$25 million into the construction of a 21st century monument at Gettysburg." There is no assessment or discussion, or even recognition, of this adverse effect in this GMP/EIS.

f Additionally, this GMP/EIS also contains insufficient detailed information to make informed decisions on other components of the proposed action. For example, in regards to other components of the proposed action, three pages of the GMP/EIS discuss "minor boundary adjustments" (pp. 81-83). Without accurate cartography, it is simply impossible to assess this portion of the GMP/EIS. On p. 109, it is noted that Alternative B would entail new shops and buildings, upgrading and change of existing facilities at the historic Roller Building. No further definition is provided. What does the Roller Building maintenance complex look like now? What is the building's history, National Register eligibility, current use and condition, architectural style, and materials. What precisely are these new maintenance facility changes? How many shops and buildings? Where in relationship to the current facility, and in relationship to avenues traveled by the visitors? What will they look like architecturally, what materials will they be constructed of, how large and how high? How will they be screened from the public? What mitigations are necessary to avoid adverse impacts to the National Register eligibility (if such) of the Roller Building? How many people will work there? I have no doubt that GNMP will require a significant expansion of its maintenance personnel, equipment and capabilities. In fact, I believe that GNMP has under-estimated such requirements. I do not question the need for GNMP to expand its maintenance facilities. But I do require sufficient details to perform an environmental assessment of such an expansion. On pp. 116-117, discussion is made of the restoration of Ziegler's Grove. Such an effort would be laudable. However, once again no details are provided. What will the final restoration look like? How will modern park avenues and monuments be incorporated into it? Where will visitor access be? Where will visitor parking be? What trees and landscaping will remain, be removed, and/or be added? What historic roads will be restored? I have no qualms regarding the ability of the NPS and GNMP to accomplish this in a historically accurate and sensitive treatment. But I cannot perform an assessment of its environmental impacts without sufficient details. Pages 123 (Commemorative Area, 2nd •), and 131 (2.9.3, second ¶) both note that some administrative and maintenance functions will be moved to Guinn Woods (Fantasyland site). Again, no further mention or discussion of this is provided. The reviewer and general public does not know what functions, what buildings, where, what they will look like, how many parking areas and spaces, where will access be, etc.? This GMP/EIS clearly states that GNMP is going to great lengths to restore the historic landscape at the Angle and Ziegler's Grove. One of the concerns of the *Draft Development Concept Plan and Environmental Assessment, Collections Storage, Visitor & Museum Facilities, Gettysburg National Military Park, Pennsylvania* (GNMP, May, 1996) was that park facilities located here would be highly visible to visitors on Cemetery Ridge. This may

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## RESPONSES

f NPS has detailed accurate maps of the land within the boundary. Many large-size maps are needed to describe the land within the park boundary. These land status maps are kept in the Land Resources Project Office at the park. Many of the changes recommended by this GMP are minor corrections needed to meet the intent of Public Law 101-377, which established the park's new boundary.

g The recommendations for the Roller Building which are cited in Alternative B embrace the area now occupied by the park's maintenance operations at the junction of the Pleasonton Avenue and the Taneytown Road (Pa. Route 134). The War Department's Roller Building was originally erected in the first decade of the twentieth century to house its steamrollers and other equipment used to maintain the park's avenue system. In the 1930s, the NPS altered the exterior appearance of the Roller Building through the addition of brick wings, a courtyard, a heating plant and chimney, as well as the redesign of its parapets. Through the 1980s, other ancillary buildings were erected in the rear of the Roller Building, including a garage, oil shed, and carpenter shop. Likewise, the interior of the 1930s wings has been modified from open bays to shops and to offices. As the last surviving building from the commemorative era, the Roller Building itself would not suffer any more adverse impacts from future development at the maintenance complex. The building is eligible for listing on the National Register of Historic Places, and any changes or modification to it will meet all applicable regulations.

h Details concerning the restoration of Ziegler's Grove would be developed during the landscape treatment planning for the battlefield. It is therefore impossible to describe the final appearance of this site's restoration, but existing monuments, Hancock Avenue, and other contributing features significant to the commemorative era will not be affected by the restoration effort. The historic limits of the Grove would be restored, which would include the planting of trees on the site of a portion of the existing Cyclorama building and the parking lot.

A GMP defines the basic philosophy of park management and provides broad guidance to park managers who make hundreds of decisions each year that can affect a park's resources and its visitors. A GMP sets direction for resource protection and visitor use in consultation with the public, and NPS adopts its

## COMMENTS

well not be the case, but without sufficient documentation such analysis cannot be performed.

Many of the proposed actions presented in this document are well considered, would have a significant and positive effect upon the Gettysburg battlefield, and would greatly enhance the visitors experience at GNMP. I find much that is laudable in Alternative D, Maximum Park Rehabilitation. However, the insufficient information and incomplete environmental analysis on the development of GNMP/Kinsley Visitors Center, as it is presented in this document, precludes my endorsement of any alternative in which it is included. With great regret, I must thus state my support for Alternative A, No Action, Continuation of Current Management Practices. However, with revisions to this document I believe that I could certainly support most of the proposed actions in this GMP/EIS. I look forward to seeing such revisions.

I appreciate you offering me an opportunity to review this document, whose provisions will have such an important effect upon GNMP, the Gettysburg community, Adams County, and historic preservation and interpretation efforts throughout the nation. I look forward to reviewing another updated and enhanced Draft of the GNMP GMP/EIS at some point in the future.

Respectfully Yours;

Douglas R. Cubbison

2 Enclosures

## RESPONSES

findings and uses them to guide the management of a park for 10 to 20 years. Typically, site-specific details and recommendations are not included in the GMP alternatives, since the GMP is intended to provide a framework for more detailed management decisions. A more detailed implementation plan would be prepared once this action has been funded. However, in the case of the proposed administrative facility, NPS has completed and approved a Development Concept Plan/Environmental Assessment (1989) for the project. In this case, the draft GMP/EIS carries forward the already-approved recommendation. The 1989 plan would be updated if necessary when funding for the proposal is received.

**Enclosure 1 - Detailed Comments of Douglas R. Cubbison**
**on**
**Draft Gettysburg National Military Park**
**General Management Plan/Environmental Impact Statement,**
**dated August 1998**

| | Page | Figure, Table or Paragraph | Comments |
|---|---|---|---|
| i | xii-xix | Forward "The Battle of Gettysburg" | General Comment: This portion of the document fails to adequately discuss the military operations in the vicinity of the proposed GNMP/Kinsley Visitor Center. Nowhere in this document are military operations on this component of the GNMP Historic District presented to the public. Thus, it is impossible to make a determination of historic significance on the proposed location of the GNMP/Kinsley Visitor Center. |
| j | 1-26 | Chapter 1 Purpose and Need for Action | General Comment: The Purpose and Need for the Proposed Action is never adequately presented. 40 CFR 1500 is the applicable section in the Code of Federal Regulations that provides guidance and direction to Federal Agencies for the implementation of the National Environmental Policy Act (NEPA). 40 CFR Sec. 1502.13 -- Purpose and Need, states that: "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." Nowhere in Chapter 1 is the Purpose and Need specifically identified, or clearly stated, as required by 40 CFR 1500. |
| k | 5 | 1.2.1 Second ¶ on page | The 1990 GNMP Boundary Legislation is first mentioned here. However, the far-reaching and important changes to the management of GNMP resulting from this legislation are never conveyed in this document. This paragraph should contain a substantially expanded discussion and analysis of this legislation. Additionally, although the 1990 GNMP Boundary Legislation is properly provided on pp. 309-311, nowhere is the important revised boundaries map established by the legislation provided. This legislation provided for the return of some small portions of the battlefield to the community tax base. Nowhere are any of these properties of this provision mentioned or discussed, nor are the specific properties delegated for removal from GNMP identified. |
| l | 11 | 1.6.1 First ¶ | This paragraph does not clearly convey the differences between "land acquired" by the NPS (that is, land over which the GNMP has legal control), and "land authorized" by Congressional legislation which establishes the legal park's boundaries. This is an important distinction. This paragraph suggests that GNMP has acquired 2,050 additional acres since the 1990 GNMP Boundary Legislation. This is, of course, not accurate. Rather, the authorized park boundaries were cumulatively expanded by 2,050 acres. Some of this acreage has, of course, been added to the park; and these additions should be identified and the acreage listed. |

i The narrative describing the military operations during the Battle of Gettysburg, part of the Forward of the draft GMP/EIS, is intended to generally cite the significant actions and movements that influenced the outcome of the battle. It is because such significant actions and movements did not occur on the site proposed for the location of the museum complex that it was not included in this descriptive narrative. The relative historic significance of this portion of the battlefield in comparison with other parts of the field can be deduced from its exclusion in this narrative. It also can be ascertained from an examination of the maps which support a description of the park's historic landscapes in Chapter 2, on pp. 44-47 of the draft GMP/EIS (Figure 8: Key Battle Landscape Features [KOCOA] and Figure 9: Battle Action Area).

j The purpose and need for the General Management Plan is described on page 2 of the document.

k The boundary map referenced in the 1990 boundary legislation is not provided in the draft GMP/EIS because of its large size. Making a reduced copy for publication in the draft GMP/EIS was not feasible because it would not be legible. Copies of the legislated boundary map are kept at the Land Resources Project Office at Gettysburg National Military Park. The NPS and Gettysburg Historic District Boundaries shown in Chapter 2, Figure 8 match the boundaries shown on the map that accompanied the Boundary Legislation.

l There are over one hundred privately owned tracts of land within the Gettysburg National Military Park boundary. These tracts are identified in the park's Land Protection Plan, as updated. It is the long-term intent of the National Park Service to acquire land or easements on all of these tracts. Whenever possible, NPS would negotiate with willing sellers, as land acquisition funds are made available by Congress.

Chapter 1, Section 1.6.1, paragraph 1 has been revised to explain that most of the land added by the 1990 boundary legislation is privately owned. Acreage that has been acquired by the Park since 1990, is a matter of public record and tracts that have been acquired are identified on the National Park Service Land Status Maps, which are kept at the Land Resources Project Office at Gettysburg National Military Park.

## COMMENTS

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| | 12 | 1.6.1 Second ¶ on page | This paragraph presents the history of GNMP's agricultural management of the battlefield. However, it does not discuss GNMP's experimental Granite Farm project, which was a mid 19th Century Living History Farm that was established on the grounds of the Granite Farm. This project was an attempt to restore 19th Century agricultural practices on at least a small portion of GNMP. The Granite Farm Project operated in the 1970s, and should be discussed in this paragraph. Specifically, the reasons for its elimination by GNMP should be discussed. |
| | 12 | 1.6.1 Fifth ¶ on page | Third sentence states "Lack of appreciation of the park's meaning and purpose has led to a spate of vandalism..." Lack of appreciation is probably not a contributing factor. Lack of adequate law enforcement on the part of GNMP, and lack of adequate coordination between GNMP's law enforcement activity and local law enforcement agencies is more likely the underlying problem. Thus, the Purpose and Need Chapter presents a need for this proposed action, which does not appear in the GNMP GMP. Therefore, a component of this GMP should be "enhanced and expanded law enforcement activities on the part of GNMP." |
| m | 13 | 1.6.1 First ¶ on page | The statement is made that "The costs for conservation of the painting probably range between $1,000,000 and $5,000,000." I find impossible to believe that, although conservation of this nationally significant Gettysburg Cyclorama painting is an important component of the proposed action, that GNMP does not know how much it will cost. This sentence must be significantly expanded, and the specifics of the Gettysburg Cyclorama painting curation must be presented. If the cost range may vary depending upon specific conditions, then this information should be made available to the public (who, after all, are paying for this curation). |
| | 13 | 1.6.1 Second ¶ on page | Observation is made that over-grazing of white-tailed deer have caused impacts to the historic landscape. On page 70 of the National Park Service's *White-Tailed Deer Management Plan Final Environmental Impact Statement* (EIS), Photo 9 depicts a browse line created by deer. Such an open appearance in wood lots is, in fact, an accurate replication of how these wood lots have appeared in 1863. During the Nineteenth Century, most farmers let domestic animals such as hogs run loose in woodlots to forage. As a result, many woodlots would have had little underbrush and would have been relatively open and easy to see into. The browse line depicted in this photograph is nearly identical to one that would have been created in 1863 by domestic animals. With the reduction of the White-Tailed deer population, these woodlots will be much more dense and more of an obstacle to vision and movement than they were in 1863. The ability of park visitors to see into wooded areas would be compromised. Thus, the removal of these white-tailed deer may well have resulted in an adverse effect on the visual and historic aesthetics of GNMP. From this standpoint alone, the entire issue of deer management should not be ignored in this GMP/EIS but should rather be re-visited. |

## RESPONSES

m Painting conservators who have examined the Cyclorama painting over the recent years have been reluctant to provide an estimate for the total restoration of the painting. In essence, the situation is comparable to a historic house with a leak in the roof; although it is easy to know that the roof shingles must be replaced, it is difficult to speculate how rotted the structural roof components may be until the shingles are actually removed. In the case of the Cyclorama painting, based upon visual inspection of the painting, conservators have speculated that complete restoration may range from $1 to $5 million. The only way to improve upon this range of estimates would be to secure funding for a complete condition assessment of the painting, and a treatment plan for its restoration. The estimated cost of this work is $500,000.

## COMMENTS

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| | 17 | 1.6.1 Paragraphs 1-2 | It should be noted that another contributing factor to the siting of the Cyclorama Building was the desire to have the visitors experience the same perspective as the painting. In point of fact, the viewing area atop the building was designed with this in mind. |
| | 17 | 1.6.1 Third ¶ | Statement is made that Cyclorama Building contains asbestos ceiling tiles which should be removed. Current asbestos management practices are for non-friable asbestos to be left in place. If these tiles are non-friable, they should NOT be removed but should simply be left alone. If, however, the tiles are friable they should ALREADY have been removed for NPS staff safety. Please state whether these asbestos tiles are friable or non-friable, and adequately address GNMP's asbestos management plan. |
| n | 26 | 1.8.5 | Strongly disagree with statement that "it is not necessary to discuss this issue" in reference to white-tailed deer management at GNMP. In fact, management practices of white-tailed deer at GNMP contribute to the continuation of the agricultural lease program for modern agricultural tenants that the park's proposed action alternative would reduce or eliminate. Currently, GNMP and a local citizens group remain in litigation over this issue. White-Tailed deer management also has a significant impact upon historic fence restoration, historic landscape management, and flora and fauna management. Also refer to my previous comment on p. 13, 1.6.1, 2nd ¶. White-Tailed deer management should be integral to the GMP for GNMP, and should be discussed in this EIS. |
| o | 29-30 | 2.2.1 Landscape Changes over 135 Years | This section is a valuable documentation of the many changes to the battlefield over time. However, I am concerned that one of the single greatest adverse changes to the historic battlefield topography is not discussed in the GMP/EIS. Specifically, within the past decade Gettysburg College destroyed a historically and topographically significant component of East Seminary Ridge, disturbing and moving interpretive battle monuments, and causing severe erosion problems. This ridge destruction should be discussed in detail in this portion of the GMP/EIS. |
| | 30 | | General Comment: This section clearly suggests that National Park Service management has caused much of the adverse impacts upon the historic landscape of the Gettysburg battlefield. This analysis should be stressed, and highlighted in the Purpose and Need Chapter, as it reinforces the need for this GMP and EIS. |
| p | 31 | Table 1 | An interesting and useful table which greatly contributes to the GMP/EIS. Information on landscape features should also be included for 1895 and 1927, which as p. 30 correctly notes were pivotal years in the management of the Gettysburg battlefield. This would expand the public's comprehension of how different management of the battlefield over time has impacted the historic landscape. |
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## RESPONSES

n The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the draft GMP/EIS are the same as those approved in 1995. The objective is to maintain the density of white-tailed deer at Gettysburg National Military Park and Eisenhower National Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in both the Final White-tailed Deer Management Plan / Environmental Impact Statement (FWDMP/EIS) and draft GMP/EIS would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a lawsuit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white tailed deer management program was reinstituted at the park 14 days later. The plaintiffs have appealed this ruling and the matter is currently pending.

o The discussion pertaining to landscape changes since the battle, which appears on pages 29-31 of the draft GMP/EIS, is not intended to describe in detail all of the changes that have occurred on the battlefield. The intent of the discussion was to describe in a general sense the changes as they appeared on the four era maps. Specific and significant changes to the landscape will be described in greater detail in the subsequent Cultural Landscape Report, which will address only those lands inside the current park boundary.

p The information you are requesting is being prepared as a part of the park's Cultural Landscape Report, which would be completed after the final GMP/EIS is issued and approved. As you indicate, the Cultural Landscape Report, which will include detailed information on the 1895 and 1927 period, would provide interesting historical perspective for readers.

## COMMENTS

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| q | 32-41 | Figures 3-7 | These are very important figures, and they provide the reviewer and general public with valuable and interesting information. However, I cannot ascertain the Gettysburg NMP Boundary on these figures. On the copy of the Draft GMP/EIS provided to me, I also cannot ascertain the difference between Eisenhower NHS Boundary and Gettysburg NMP Boundary. Please use different symbols, if possible, that are more visible and distinctive. |
| r | 32-41 | Figures 3-7 | I cannot find a definition of the differences between the Gettysburg NMP Boundary, and Gettysburg Historic District boundaries. Please clearly define what these boundary designations are. |
| | 40-41 | Figure 7 | This figure fails to document a critical missing 1863 topographical feature. Specifically, the destruction of a large portion of East Seminary Ridge by Gettysburg College within the past decade. The area of this devastating disturbance must be annotated on this figure. |
| | 43 | Second ¶ on page | During my six years of active duty as a Combat Arms Commissioned Officer in the U. S. Army (1980-1986) and four years with the active reserves (1986-1990), the correct acronym was OCOKA (not KOCOA as used here). |
| s | 43 | Fourth ¶ on page, line 4 | The word "reports" is used twice in same sentence. |
| | 43 | Fourth ¶ | The analysis presented in this paragraph only provides an assessment for core battlefield action. This analytical process should be modified, to also present related battlefield activities such as hospitals, headquarters sites, skirmish lines, wagon parks, approach marches, retreat routes, unengaged artillery positions, etc. Additionally, this analytical process should also be modified to present a second layer of core battlefield significance, for combat areas that played a significant role in effecting the outcome of the battle (for example, the advance of Jubal Early's division in outflanking the Union XI Army Corps on the late afternoon of July 1). The analytical process as employed here produces a skewed identification of key terrain. |
| t | 44-45 | Figure 8 | The symbol for "Signal Stations" vanishes on my copy. I cannot ascertain their location. Please use a different symbol. |
| u | 44-45 | Figure 8 | Note that the analytical process used fails to identify any military operations in Gettysburg. Obviously, the Union I and XI A. C. retreated through the town, closely pursued by Confederate forces, on the late afternoon of July 1. Confederate skirmishers occupied the town throughout July 2-4, and fighting on the periphery of the community reached a crescendo on several occasions. This reinforces my previous comment for page 43, Fourth ¶. |
| v | 44 | Figure 8 | Union Signal Station that operated from Pennsylvania Hall, Gettysburg College on July 1 is not identified on this map. |
| w | 46-47 | Figure 9 | I cannot tell the differences in the shades of gray used for "Major Action," "Moderate Action," and "Major Action." Please use different symbols for greater clarity. |
| u (cont.) | 46 | Figure 9 | Fails to present tactical troop movement of Union I and XI A. C. retreat through Gettysburg, and Confederate pursuit. |

## RESPONSES

q The line symbol used for both the Eisenhower NHS and the Gettysburg NMP is an alternating dot and dash. The Gettysburg NMP line is shown in a darker shade. This line will be made even darker in the final GMP/EIS.

r The line symbol used for the Gettysburg NMP is an alternating dot and dash. The line symbol used for the Gettysburg Historic District is a solid line. The Gettysburg Battlefield Historic District is described in Chapter 3, Section 3.4.8 on page 196 of the draft GMP/EIS.

s The word "civilian" has been inserted between "letters" and "reports" in the final GMP/EIS to clarify the meaning of this statement.

t A darker shade will be used for the signal stations symbol in the final GMP document.

u Even though the town of Gettysburg is outside of the park, military action within its confines was included in the battle analysis and in the mapping effort. NPS recognizes the significance of the battle action within the town on all four days of the battle. Please note the summary of the mapping as presented in Figure 9, "Battle Action Area," on pages 46-47 of the draft GMP/EIS.

v A signal station symbol was added to the map in the Pennsylvania Hall location.

w Unfortunately, the printing process did not allow for as much distinction between tones as appear in the original maps. However, it is possible to discriminate between areas of battle action and non-battle action. Larger, full-color copies of the maps are available in the park's GIS office.

# COMMENTS

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| | 48 | 2.2.3 First ¶ | Second sentence implies that War Department installed monuments on the battlefield. The War Department did install the avenues and some interpretive markers. However, the Veterans and States installed the overwhelming majority of the monuments on the Gettysburg battlefield. |
| | 49 | Figure 10 | This is a valuable and informative figure that makes a contribution to comprehension of the GMP/EIS. However, no figure that correlates to the current appearance of the Gettysburg National Cemetery is ever provided. This makes it impossible for the general public and reviewer to comprehend the changes to the cemetery over time. Additionally, although there are expansive discussions in regards to the change of the battlefield over time, there is no corresponding (and necessary) discussion of the changes to the National Cemetery over time. |
| | 50-51 | Figure 11 | The flawed methodology used to define "Battle Action" in this section is clearly revealed here, for the entire town of Gettysburg should fall within the category of "Major Battle Action Area." |
| | 53 | Table 2 Partnerships and Cooperative Actions | It is essential to this plan that "Cooperation with Borough of Gettysburg, adjacent townships, Adams County, and Commonwealth of Pennsylvania" be added as a Resource or Activity that is Covered under Partnerships and Cooperative Actions. |
| | 54 | Alternative A ¶ - line 14 | The word "bollard" is not a term likely to be recognized by the general public. Please replace, or define. [Universal Change] |
| x | 62 | 2.6 Third ¶ Last Sentence | The words "at specific points in time" should be added to the end of the last sentence. The monuments for individual regiments and units obviously only represent a unit's most important position, or a position occupied for the longest amount of time. Civil War battles (and indeed all battles) are fluid activities during which military units frequently displace. |
| | 64 | 2.6.1 | The use of the various subzones appear to be an effective analytical and planning methodology. However, no figure or map provides where these subzones currently exist, or where they are proposed to exist under various alternatives. Verbal descriptions provided are too vague to be effective. |
| y | 65 | 8th ¶ on page | The reviewer is pleased to know that "A survey and assessment of the park's archaeological resources is underway." However, the reviewer is not aware that such a survey is in fact being performed. Please provide a comprehensive discussion of who is performing this survey, where it is being performed, why it is being performed, how and when, and what technical methods are being used. This pronouncement is so vague as to have no utility. |
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# RESPONSES

x The words "at a specific point in time" have been added to the end of the last sentence of the 3rd paragraph in the final GMP/EIS.

y An archeological overview and assessment was initiated at the park in 1992 in response to the mandates of the National Historic Preservation Act. The draft GMP/EIS, page 211, discusses the policies that directed the Survey and Inventory Project (SAIP). Regional NPS archaeologists conducted excavations, pedestrian surveys and historic document compilations to estimate the location and condition of sites throughout the park. The SAIP inventory of known sites is substantively complete and will be expanded by park staff, as more sites are located. There is more discussion of the known archeological sites on page 223 in the GMP and referenced in Appendix 1, References: Halchin 1998.

## COMMENTS

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| z | 66-67 | 2 & 3 | No discussion is presented here in regards to recreational uses. Recreational uses would include horse trails, walking paths, bicycle paths, bicycle (both off-road and on-road), jogging, road-races, orienteering events, etc. It appears that special and recreational uses are lumped into one category, when in fact they are distinctive and separate activities which require separate analysis. No discussion of the park's current management practices for recreational and special uses is provided. |
| aa | 75 | 5th Management Prescription | This Management Prescription states that "No new monuments are built on the park." I strongly oppose this. The argument for the site of the new Visitors Center is that it will be located on a piece of ground that lacks historic significance. If this is the case, why cannot a Commemorative Area be established adjacent to the new Visitors Center? I agree, that no new monuments should be placed on the battlefield. However, a Commemorative Area could be established adjacent to an area of great intrusion, such as the new Visitors Center. Two recent monuments are good examples of such placement. The Masons' Monument was placed in the annex to the National Cemetery. The Maryland State Monument was placed adjacent to the Cyclorama Parking Area. Neither monument intrudes upon the historic vistas of the battlefield. |
| | 76 | 5th bullet, under "Examples Appropriate Actions" | Gettysburg is a Borough, not a town. |
| | 80 | 7th line under "Examples of Resources" | Add word "rifle" in front of "pits" so that sentence reads: "Original stone walls, earthworks, lunettes and rifle pits built by battle participants." This is a more correct historic and military term. |
| bb | 81 | 7th and 8th lines under "Examples of Resources" | Please define "WPA" and "CCC." The general public may not know what these acronyms mean, and they may not know what the "WPA-era" and "CCC-era" are. Additionally, at some point in the GMP/EIS a discussion of WPA and CCC presence and contributions at GNMP should be presented. |
| f (cont.) | 81-83 | "Park's boundary and land acquisition ..." | This portion of the document, which discusses changes to the 1990 Gettysburg Boundary Legislation, are completely meaningless without a map. It is impossible to assess this portion of the GMP/EIS without proper cartography. |
| | 81-83 | "Park's boundary and land acquisition strategy..." | The proposals contained herein effectively abrogate the 1990 Gettysburg Boundary Legislation. One of the great community concerns expressed during public hearing and public comment during this boundary adjustment process was that GNMP is continuing to expand, permanently removing acreage from the local community's tax base. Certainly GNMP makes great financial contributions to the local communities. However, these local communities must still maintain a local tax base to provide services |

## RESPONSES

**z** The criteria that the NPS uses to determine appropriate recreational and special uses for all NPS sites can be found in our enabling legislation, regulations, policies and guidelines. The draft GMP/EIS (p. 16) is very specific in stating that "Gettysburg National Military Park will not provide facilities developed and intended for purely recreational use or for exercise functions." The guidance on recreational and special park uses can be found in the Code of Federal Regulations in 36 CFR Chapter 2, and in our Special Park Use Guideline, NPS-53. In brief, these documents define appropriate park use as an activity that is consistent with the purpose and values for which the park was established, and which contributes to the visitors understanding of the park. Gettysburg NMP has applied this criterion in the past and would continue to do so under the proposed alternative. In the case where an existing use is deemed inappropriate, NPS would work with the local community to find alternative locations for these events.

**aa** The ban on future monumentation from all portions of the park is necessary in order to prevent incremental accruals and changes to Gettysburg's historic battle and commemorative landscapes. Concentrating additional memorials on the grounds of the new museum may complicate the disposition of that property in the future. The NPS encourages other activities or forums to commemorate battle actions and participants.

**bb** We recognize that the acronyms WPA and CCC may not be as universally recognizable as they were fifty years ago. We will therefore re-identify the examples cited on page 81of the draft GMP/EIS. The contributions and work of the CCC and other New Deal programs at Gettysburg are alluded to in the historic narrative pertaining to the NPS, although not specifically by name.

# COMMENTS

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| | | | to the community and to the National Park. For example, the great traffic generated by visitors to GNMP alone means that local communities must spend more funds on roads and highways maintenance than would normally be necessary. One of the concessions to the local community was the return of small, inconsequential, rarely visited parcels of GNMP to private ownership. Among these parcels were Jones Battalion Avenue and Seminary Lane. I am opposed to the retention by GNMP of these two parcels. I cannot perform further assessment without adequate documentation (cartography) as the previous comment notes. |
| cc | 83 | "Non-historic and non-contributing structures..." | In regards to the proposed restoration of the Ziegler's Grove area, this is a laudable desire. However, I must insist that some parking be maintained for the National Cemetery. In addition to the Civil War dead, many veterans of recent conflicts are buried in the National Cemetery. Many of the relatives, family and friends of these veterans are elderly. Parking MUST be maintained for their access to the National Cemetery. This need not be a massive parking area, and it can be carefully landscaped to be non-intrusive. But any restoration plan must take into account the needs of our nation's veterans, and provide provisions for some National Cemetery parking. |
| 88 (cont.) | 84 | "No new monuments are built in park" | I strongly oppose this. The argument for the site of the new Visitors Center is that it will be located on a piece of ground that lacks historic significance. If this is the case, why cannot a Commemorative Area be established adjacent to the new Visitors Center? I agree, that no new monuments should be placed on the battlefield. However, a Commemorative Area could be established adjacent to an area of great intrusion, such as the new Visitors Center. Two recent monuments are good examples of such placement. The Masons' Monument was placed in the annex to the National Cemetery. The Maryland State Monument was placed adjacent to the Cyclorama Parking Area. Neither intrudes upon the historic vistas of the battlefield. If it is a question of park maintenance for these monuments, a requirement that future monuments be installed with a small endowment fund for eternal maintenance could be incorporated into new monument guidelines. |
| | 92-94 | 2.7.3 | This proposed action constitutes a sweeping change to pedestrian, jogging, mountain bicycling, and equestrian recreational usage of the park. This proposed action is based purely upon historic prerogatives. In addition to being a historian, I have previously been a sponsored competitive distance runner, am a licensed bicycle racer, and regularly ride horses. I have, in the past, performed distance running training on the paths of GNMP. I have some concerns with this proposed action. First, some analysis should be performed, to ensure that this action on the part of GNMP would not terminate or sever other existing trails. Second, GNMP must closely coordinate with the Borough of Gettysburg, Gettysburg College and Adams County to insure that alternate recreational trails are established for the use of residents and students. Otherwise, |

# RESPONSES

**cc** Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the road. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new museum complex to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants.

## COMMENTS

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| | | | recreational opportunities will be removed from the community. Third, the possibility of moving recreational trails from core battlefield areas to portions of GNMP that have low historic significance (such as the Levan Tract) should be explored, rather than simply eliminating such trails. This action, as proposed, will result in an adverse impact to the quality of life of local residents and visitors. There is no discussion of such environmental impacts, and mitigations, occurring from this action in this EIS. |
| dd | 95 | "All public activities..." 3rd bullet | What is a "Superintendent's Compendium?" This is the first and last time that this document is mentioned in the GMP/EIS. Please provide a definition and clarification. |
| | 95 | "Damage... as a result of vehicular traffic..." | I concur that traffic congestion is an issue at GNMP. One possible solution, not provided in this GMP, is to limit access to certain park roads to smaller vehicles such as automobiles and motorcycles; and to preclude access to large RVs, trucks with trailers, etc. This would permit vehicular access to the battlefield, while reducing the considerable congestion caused by particularly large vehicles. |
| | 96 | Third ¶ on page | I support the closing of some avenues to general automobile and bus traffic, and support their authorized use by Licensed Battlefield Guides or ranger-led tours. This exception should be expanded to include specific tours that receive authorization from GNMP. For example, some large groups might have an interest in a specific component of the field, and might desire vehicular access. A system should be in place to accommodate such special requests. |
| | 97 | 2.7.4 First ¶ | The Gettysburg Battlefield Preservation Association (GBPA) has been deleted from this list, and should be included. The GBPA has purchased more of the battlefield than any other entity except for the National Park Service. |
| ee | 97 | 2.7.4 First ¶ First bullet | Typographical Error. Remove "," after "park" so that sentence reads: "...extend their services to the park by providing training, support, recruitment, and other services." |
| | 97 | Next to last ¶ on page "Foundation Organization and Board" | How large will this Board of Directors be (how many members, will some organizations have more than one member, how will chairman be chosen, etc.)? I am concerned that this Board will have no local community participation, no local business community participation, and no local Civil War preservation organization participation. I believe that the composition of this Board of Directors requires additional formulation and refinement before its effectiveness can be accurately assessed. As the Board of Directors stands now, it will be incapable of effective coordination with the local community and its concerns. |
| ff | 97 | Next to last ¶ on page "Foundation Organization and Board" last sentence | Typographical Error. Insert word "on" between "serve" and "the" so that sentence reads: "Although NPS cannot serve on the board, representatives...."<br><br>Certainly the board is serving the NPS, the NPS does not serve the board! |

## RESPONSES

**dd** Title 16, Section 3 of the U.S. Code directs the Secretary of the Interior to promulgate regulations for the administration of the National Parks. Those regulations are published in Title 36 of the Code of Federal Regulations, Chapter 1. Many of the regulations permit the superintendent of a park some latitude to regulate, restrict or permit certain activities or uses within parks. The Superintendent's Compendium is a compilation of those park-specific decisions. The decisions included in the Superintendent's Compendium have the authority of regulation. The Superintendent's Compendium is periodically reviewed and updated.

**ee** The comma after the word "park" has been removed in the final GMP/EIS.

**ff** The word "on" has been inserted between "serve" and "the" in line 5 of "Foundation Organization and Board" in the final GMP/EIS.

## COMMENTS

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| gg | | 97 | Last ¶ on page "Funding Requirements and Fund-raising" last sentence | Typographical Error. Remove "," between "million" and "through" so that the sentence reads: "The Foundation would raise no more than $11.925 million through non-recourse commercial loans." |
| | | 98 | Fourth ¶ "Start-up costs for the Foundation" | A concern is that a ceiling is not set for "out-of-pocket" expenses that will be reimbursed to the Cooperator (the Kinsley Equities). I see no problems with reimbursing such expenses, but controls should be in place to preclude excessive, un-anticipated costs. |
| | | 98 | Sixth ¶ on page "Operating Pro Formas..." first sentence | It is noted that "The non-profit Foundation" would collect moneys and rents to pay the mortgage payments due on the building's mortgage." This is the first mention of such a mortgage, which I would have expected to find in "Funding Requirements and Fund Raising." The relationship between the mortgage, and the "non-recourse commercial loans" previously mentioned should be elucidated. |
| | | 99 | "Control of the Site" | No specifics of the Levan Tract are provided. A map should be provided, clearly indicating the boundaries of the Levan Tract, and the "footprint" or "template" of the proposed GNMP/Kinsley Visitor Center facilities. The size (acreage) and access of the Levan Tract should be delineated. |
| | | 101 | 3rd ¶ | No definitions are provided for local zoning, for the land surrounding the park. General public may not know what "medium density residential" or "mixed uses zoning" is. |
| | | 101 | 3rd ¶ Last sentence | I think it is safe to state that "Intense suburban development and strip shopping along the entrance corridors to the park will have an adverse effect on visitors..." |
| hh | | 102-103 | Figure 15 | This is a valuable and important figure, and it provides information that directly contributes to this GMP/EIS. However, no narrative definitions are provided for local zoning, for the land surrounding the park. General public may not know what "medium density residential" or "mixed uses zoning" is. |
| ii | | 104-105 | Figure 16 | Benner's Hill and Bower's Hill are both key viewsheds. However, here they are listed as "Interpreuive Observation Points." Neither of these hills currently have any interpretation on them. Nowhere in this GMP is it stated that either Benner's Hill or Bower's Hill will have interpretation established. There is no definition of "Interpretive Observation Point." This requires clarification |
| jj | | 106 | Second • on page, last line | It is noted that the NPS will initiate cooperative agreements with willing owners for the Lincoln Train Station. It was my impression that the Gettysburg Visitors Council was using this station as a visitors contact station, and was intending to continue this use? Is this not accurate? If it is, why does a willing owner need to be coordinated? Please provide some elucidation. If not, please describe the present circumstances at the Lincoln Train Station. |

## RESPONSES

**gg** The comma between "million" and "through" has been removed in the final GMP/EIS.

**hh** Different definitions and categories for zoning districts are used in each of the municipalities surrounding the park. For this reason, the categories used in Figure 15 were generalized according to the following guideline: Low Density Residential — Municipality allows residential development on lots larger than 1 acre; Medium-High Density Residential—Municipality allows residential development on lots of 1 acre or smaller; and, Commercial, Industrial, Mixed Use — Municipality allows commercial, industrial, or residential development.

**ii** The interpretive observation points used in creating the key viewsheds map are locations within the park from which a good view of the battlefield is available. Both Benner's Hill and Power's Hill have commemorative markers and/or tablets that describe the action in that part of the battlefield. Both sites are used by licensed battlefield guides and others to understand the battlefield, and are therefore part of the park's interpretive landscape.

**jj** Ownership of the Lincoln Train Station was recently transferred to the Borough of Gettysburg. The Borough wishes to restore the train station and use it for interpretive purposes. The Borough has asked for NPS assistance in that effort.

| | COMMENTS | | | RESPONSES |
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| | 111 | Figure 17 | I am completely befuddled by this figure. Where is the viewer looking from? What direction is the viewer looking? What is the scale of the sketch? Please identify key terrain features. | |
| | 112 | 2nd ¶ | Mention is made that "Cultural Landscape Reports" and "Woodlands Management Plans" would be developed. There is no discussion as to what these plans are, what they contribute, how they would be used, etc. Please provide definition. | |
| kk | 115 | Commemorative Area 2nd ¶ 3rd sentence | Sentence "Visitors should also understand that the price of joint commemoration of this battlefield and others at the time of the reconciliation of the north and the south was a continuation of inequality between the races." is racially and politically charged, is of questionable historic validity, and is not appropriate to Gettysburg, Pennsylvania - a community that was active in the Underground Railroad, and has had a viable and prosperous African-American for many decades. Please remove this inappropriate sentence from this document. | kk Public Law 101-377 (August 17, 1990) charged the park to interpret the Battle of Gettysburg in the larger context of the Civil War and American history. The park's commemorative era is part of that larger context. The reconciliation between northern and southern white veterans transformed many of the Civil War battlefields into great national parks. But current scholarship in the field of history is revealing other results of this reconciliation. Indeed, as early as 1937, when Paul Buck won the Pulitzer Prize for his "The Road to Reunion," it was being asserted that reconciliation, a "new nationalism," and a "new patriotism" grew on the foundation of segregation. The issue of human rights is, and should be, a common denominator in all three nationally significant landscapes and themes of this park. The 1863 battle was the result of the many issues that led to the outbreak of the Civil War, most notably the issue of slavery. Lincoln's Gettysburg Address was grounded in the nobler sentiments of human equality that made an independent nation in the Age of Enlightenment. The commemorative park ultimately contributed to the glorification of a common valor but dismissed the larger issues of the war (including its causes and consequences). The contextual issues of the Battle of Gettysburg need to go beyond the concept of mutual glory and sacrifice. Glory and sacrifice without meaning robs these men of their worth and our visitors of a substantive understanding of why Gettysburg and other Civil War sites are significant to our mutual history and our future. |
| ll | 118-119 | Figure 19 | I am gravely concerned that Culp's Hill will be removed as a Major Interpretive Venue under this Alternative. The historic significance of Culp's Hill is monumental - for this, refer to the superlative study of military operations in this area- Harry W. Pfanz, *Gettysburg, Culp's Hill & Cemetery Hill* (Chapel Hill: University of North Carolina Press, 1993). As a student of the XII A. C., Army of the Potomac, I am incensed that this revised interpretive concept will remove the scene of one of the Star Corps' greatest triumphs. I am adamantly opposed to the implementation of the interpretive scenario proposed by this figure. | ll The intention of Alternative B is to improve NPS' ability to interpret Culp's Hill by restoring part of the historic scene of the battle there. This is true for all of the action alternatives. No feature significant to the outcome of the battle will be removed. |
| | 120-121 | Figure 20 | As previously stated in my comment for p. 83, some parking be maintained for the National Cemetery. In addition to the Civil War dead, many veterans of recent conflicts are buried in the National Cemetery. Many of the relatives, family and friends of these veterans are elderly. Parking MUST be maintained for their access to the National Cemetery. This need not be a massive parking area, and it can be carefully landscaped to be non-intrusive. But any restoration plan must take into account the needs of our nation's veterans, and provide provisions for some National Cemetery parking. | |
| | 122 | 2.9 First ¶ | Statement is made that "The landscape that results would not fully reflect the conditions present in 1863..." Please elaborate on this statement- this is an important aspect of GNMP's historic landscape rehabilitation proposal, and must be clearly conveyed and comprehended. | |
| mm | 122 | 2.9 First ¶ Last Sentence | Statement is made that "A similar level of rehabilitation would also be applied to the...Commemorative Resource Area." Is this "Commemorative Resource Area" the same as the "Commemoration Subzone" presented on p. 64, section 2.6.1? If so, please use consistent language. If not, please explain what the "Commemorative Resource Area" is. | mm The use of the words "Commemoration Subzone" on page 64 was in reference to the 1982 General Management Plan. Agency planning guidelines of that era required parks to identify various subzones within their boundaries. Each subzone would be managed according to its general classification. The NPS no longer uses this terminology, although the park generally adheres to the management specifications for each of those subzones because it is still subject to the 1982 GMP. NPS directives for planning currently identify key resource areas within parks to define where there are concentrations of significant resources that relate to one or another of the park's historic landscapes. The definition of the Battlefield Commemorative Resource Area can be found on page 48 of the draft GMP/EIS. |

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| | 122 | Table 9 Second Discussion | Mention is made that "The overall mass and arrangement...reflect those typical of central Pennsylvania in the 19th century." Unfortunately, simply restoring some buildings fails to accomplish this. Central components of a farm in central Pennsylvania in the 19th century would have been domestic animals, children, and activity. Certainly, it will be impossible to replicate such conditions at every historic farm in the park. However, to effectively fulfill this management objective, GNMP must establish an 1863 living history farm on the battlefield. Nowhere is this discussed or mentioned. In the 1970s GNMP effectively operated Granite Farm as a working living history farm. It was quite popular with park visitors, and presented a key interpretive them to the public that is lacking in the park now, and is lacking throughout this GMP. I strongly urge, if the park is serious about achieving these management and interpretive objectives, that Granite Farm's living history program be re-established. This should be added to the GMP/EIS. |
| | 123 | Mission Goal | Mention is made here of a "Commemorative Area." Is this the same as the "Commemoration Subzone" presented on p. 64, section 2.6.1; and the "Commemorative Resource Area" discussed on the previous page? If so, please use consistent language. If not, please explain what the "Commemorative Area" is. |
| nn | 123 | Visitor Use and Facilities | Mention is made that GNMP will "Implement the 1988 approved Development Concept Plan for a combined administrative and maintenance facility." This is the first mention of such a plan. Could you please provide additional information and elaboration on this plan? |
| | 124 | 2.9.1 Major Battle Action Area Last Sentence | Discussion is made that Reynolds Woods (and other park woodlands) would have understory growth removed. No discussion is made, anywhere in the GMP, as to how this will be effected. White-Tailed deer did this naturally, but have been effectively removed from the park. Again, this issue deserves analysis in this GMP/EIS. |
| | 124 | Two Photographs on Page (Reynolds Woods) | Photographs and narrative discusses how GNMP will maintain historic woods as "woodlots" with "long views and ease of movement." To maintain the remaining woods at GNMP in this manner will require a staggering increase in maintenance. I will discuss this later, but I do not believe that this GMP/EIS presents an adequate increase in maintenance staff and funding. |
| oo | 124 | Two Photographs on Page (Reynolds Woods) | These two photographs do not have figure no(s). |
| | 125 | Figure 21 | I am completely befuddled by this figure. Where is the viewer looking from? What direction is the viewer looking? What is the scale of the sketch? Please identify key terrain features. |

**nn** Additional information about the 1988 Development Concept Plan for an administrative and maintenance facility can be found on pages 26 and 131 of the draft GMP/EIS.

**oo** "Figure" is not used with photographs in this document.

## COMMENTS

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| pp | 126 | 2.9.1 | I applaud GNMP's determination to restore historic field patterns. This is a commendable endeavor, and is one of the finest interpretive efforts that could possibly be performed at GNMP. However, use of wooden fences (as per the accompanying photograph) will result in a staggering maintenance load. Historically, wood fencing of various types was the predominate method of separating farm fields. I would expect that 35+ miles of fencing will be necessary under this alternative. Based upon 6 years of agricultural living history experience, this will require a vast expansion of GNMP's maintenance staff and funding. I do not believe that the personnel or funding numbers provided in this document will be adequate. | |
| qq | 126 | Photograph of historic fencing | Photograph on this page of Benner's Hill does not have a figure no. | |
| | 126 | Last ¶ on page | As with the comment on page 112, numerous reports are mentioned without a definition or explanation. Some discussion of what these reports are is necessary for comprehension. | |
| | 127 | First ¶ Third Bullet | I am thrilled that GNMP will reconstruct the Rose Barn, and strongly support this action. I would suggest, however, that this GMP/EIS provide a comprehensive list of all structures scheduled for reconstruction. | |
| | 127 | Second ¶ | Again, I offer my full support for GNMP's proposal to use fencing, orchards, etc. to define the limits of missing 1863 sites, etc. The actions that would result from this prescription are superlative. | |
| | 127 | Second ¶ Last Two Sentences | Realistically, the entire Gettysburg battlefield is an archaeological site. I absolutely agree that adequate care be given to their protection. As with my second comment previously provided for p. 12, a component of this GMP should be "enhanced and expanded law enforcement activities on the part of GNMP." | |
| | 127 | Last ¶ | I am pleased and fully support GN P's effort to reformat its agricultural program. | |
| | 128 | Soldiers National Cemetery | I am pleased and offer my full endorsement to GNMP's efforts at the Soldiers National Cemetery. | |
| rr | 127 | Soldiers National Cemetery 2nd sentence | I am confused by the sentence "Although no new grave sites would be opened...additional burials planned..." Does this mean that all grave sites at Gettysburg National Cemetery are allocated? Or does it mean that the cemetery is at full capacity? Please revise/ clarify. | |
| ss | 128 | Battlefield Commem-oration Area | Mention is made here of a "Battlefield Commemoration Area." Is this the same as the "Commemoration Subzone" presented on p. 64, section 2.6.1; and the "Commemorative Resource Area" discussed on p. 122; and the "Commemorative Area" discussed on p. 123? If so, please use consistent language. If not, please explain how the "Battlefield Commemoration Area" differs. | |
| | 128 | Battlefield Commem-oration Area | Restoration of this component of the battlefield would be exciting, and would greatly contribute to the visitors experience. I endorse it. | |

## RESPONSES

**pp** The installation of new fencing proposed in the draft GMP/EIS includes all types. Many of the areas where fencing would be constructed would be under agricultural permits in which the permittee is required to maintain those fences. NPS would depend heavily on volunteers to help maintain the new fencing, and contracting fence reconstruction and maintenance would help lighten the burden on park maintenance staff. Chapter 4, Section 4.6.1 discusses the addition of 39.1 miles of historic fencing and the removal of 20 miles of non-historic fencing for a net gain of 19.1 miles. In a four month period between May and September, 1998, a four man crew repaired and, in some cases, completely rebuilt over 5.5 miles of historic fences. These repaired fences would not have to be maintained for at least 10+ years.

**qq** "Figure" is not used with photographs in this document.

**rr** Landscape proposals for the national cemetery will not affect NPS' current management of interments. For more than two decades, the cemetery has been closed to applications for new interments (with the exception of those with pre-existing reservations or with immediate family already buried there). Implementation of any of the alternatives in the draft document would not entail changing that policy as a result of any alterations to the grounds of the Soldiers' National Cemetery. Existing grave sites would be preserved but no additional burial sections would be opened. The draft GMP/EIS (p. 128) will be clarified.

**ss** The term "Battlefield Commemorative Resource Area" has replaced other similar terms in order the maintain consistency in the final GMP/EIS.

## COMMENTS

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| tt | 128 | Battlefield Commem-oration Area Last bullet | Reconstruction of 13.3 miles of pipe-rail fencing would entail a substantial and nearly continuous maintenance effort. I grew up in Pennsylvania, and remember what the road salt used in winter does to metal. As with other components of this GMP, this will require a vast expansion of GNMP's maintenance staff and funding. I do not believe that the personnel or funding numbers provided in this document will be adequate. |
| | 129 | Major Battle Action Area 1st bullet | I do not understand how audio tours are not intrusive? From experience, audio tours are noisy and bothersome to other visitors. The battlefield is already covered with monuments, I fail to comprehend how a standard 36" x 24" interpretive marker with carefully chosen colors for the metal stand would be seriously intrusive. I would contend that a blaring speaker is much more intrusive than a simple, earth-toned sign. |
| | 129 | Major Battle Action Area 1st bullet | From personal experience, audio tours are a maintenance nightmare. Certainly improving technologies has resolved some of these problems. However, whether audio devices are loaned out or placed on the field, maintenance is certain to increase. As with previous portions of this plan, I do not believe that the personnel or funding numbers provided in this document will be adequate. |
| | 129 | Major Battle Action Area 1st bullet | No discussion is made as to whether these audio tours will be hand-held devices that will be distributed from the visitors center, or will be permanent installations on the battlefield. If permanent installations, they have the capability to cause significant adverse impacts to the battlefield which are not evaluated in this EIS. |
| nn (cont.) | 131 | 2.9.3 Second ¶ | Mention is made of "the park's 1988 Guinn Woods Administrative Facility Development Concept Plan." No further mention, introduction, explanation or definition of this Development Concept Plan is provided. |
| | 138 | Table 10 | I think that the reconstruction and restoration of historic structures, buildings, fences, historic lanes, etc. is a commendable effort, and I wish to thank GNMP for their willingness to perform this effort. However, no definition, identification or discussion of which structures, fences, lanes, buildings, etc. are to be restored is provided, with the exception of the Rose Barn. Please provide much more detailed discussion and explanation. |
| uu | 138 | Table 10 | Again, the transition from GNMP's modern agricultural program to a historic agriculture program is laudable, and I fully endorse it. However, the GMP/EIS does not adequately assess the termination of modern agricultural efforts at GNMP. This will significantly and adversely impact those farmers who currently use GNMP. I find no discussion of the economic impact of this transition in Chapter 4.0 of the EIS. |
| vv | 164 | Table 20 Operational Expend-itures | The staffing levels and monetary expenditures will be woefully inadequate, for all but Alternative A. See previous comments for clarification in regards to maintenance. Additionally, this GMP does not provide for adequate law enforcement expansion, as previously discussed. |

## RESPONSES

**tt** The reintroduction of pipe-rail fencing along some of the park's avenues should not produce significant maintenance concerns for the park. The original fencing erected along Howard Avenue in 1898 by the War Department was in place (including the original locust posts) as late as the 1960s. Because the avenue fencing was historically more than 20 feet from the avenue edge, and because the park does not use salts for the removal of ice and snow, the metal pipes should last indefinitely with minimal maintenance.

**uu** In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land used for pastures and hayfields and should therefore result in stable farm income.

**vv** The action alternatives call for significant increases in staff that NPS believes would be adequate to manage the resources of the park. As noted previously, the law enforcement issues you raise, looting and monument vandalism in the park, are infrequently reported in the park. Therefore, NPS believes that the staffing levels it is requesting would be sufficient to meet its needs.

## COMMENTS

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| ww | | 166 | 3.1.1 Third ¶ 5th line | change "dead of more recent wars" to read "burial of veterans of other historic periods." Reason: accuracy, not all veterans buried in Gettysburg National Cemetery are killed in wars. |
| | | 167 | 3.1.2 Third ¶ | Statement that federally owned historic buildings are not maintained is reason for great concern, and I appreciate GNMP's efforts to enhance and improve their maintenance. However, as discussed numerous times, operational expenditures in Table 20 for Alternatives B, C, and D are not sufficient to resolve this problem when exacerbated by new maintenance requirements |
| xx | | 168 | Third ¶ 2nd line | replace "modern graves" with "veterans' graves." Reason: more accurate. All burials in a National Cemetery (with a few exceptions) must be Veterans or their immediate family. |
| yy | | 168 | Fourth ¶ Last Sentence | I agree that maintenance funding is inadequate for the 441 major monument groups and 1,800 individual monuments at GNMP. Again, I do not believe that maintenance estimates are adequate. |
| | | 169 | 3.1.2 Last ¶ in section First ¶ on page | Do not concur that an annual operating increase of over $1 million in fiscal year 1998 is adequate for the present and future maintenance challenges facing GNMP. |
| zz | | 170 | Second ¶ on page last sentence | Statement is made that "great care has been taken in last three years to improve storage conditions" has not been validated on March 21, 1998 during a visit by concerned members of the GBPA. A copy of their findings is provided as Enclosure 2. |
| aaa | | 170 | 3.1.4 | I was surprised to find no discussion of "relic hunter" problems or vandalism at GNMP. Previous arrests and incidents should be noted, and some assessment of the problem (if there is one) should be made. |
| bbb | | 172 | 3.1.5 Second ¶ in section | Statement is made that the agricultural program at GNMP "will produce more than $33,000" in 1998. This is different than the figures provided on p. 192, Table 23, Crop Income. Please determine correct figure and make appropriate change(s). |
| ccc | | 173 | 3.2.2 First ¶ Second sentence | Add "McPherson's Ridge, Oak Hill, Seminary Ridge" to list of topographical features that Union Army occupied, and that Confederates attacked. |
| ddd | | 173 | 3.2.2 First ¶ Last sentence | Recommend removal of last sentence beginning, "In may areas, particularly on the steep soils and ridge tops...." In fact, the Union Army was able to construct formidable earthworks on Culps Hill, and East Cemetery Hill. The lack of heavy earthworks on the Gettysburg battlefield is more due to tactical decisions by military commanders than the soil conditions. |
| eee | | 174 | 3.2.2 First ¶ on page | Revise last two sentences of paragraph to read: "...extensively for buildings and other structures. Many of the park's historic buildings and lanes use local stone. Residual clay deposits have also been mined to make bricks and tiles." |

## RESPONSES

**ww** The words "burial of veterans of other historic periods" replace "dead of more recent wars" in the final GMP/EIS.

**xx** The words "post Civil War veteran graves" replace "modern graves" in the final GMP/EIS.

**yy** Cyclic maintenance funding is only one type of funding utilized for the maintenance and repair of the monuments in the park. Additional funding comes to the park for monument preservation through operations, repair rehabilitation funds, and donations from states, private individuals, reenacting groups, friends groups, and others.

**zz** Since 1993 (the year that the first professionally trained curator arrived at Gettysburg National Military Park), NPS has invested $703,500 in improving conditions in the museum collection and archives at the park. The work includes: completion of backlog cataloging for non-archeological artifacts in the museum collection; ongoing recataloging of manual catalog records to the automated national catalog system; completion of collections management and storage plans; rehousing of artifacts and archival materials in the collections; an upgrade of the museum storage intrusion alarm system; expansion of the museum storage area into an additional 1,600 square feet of space; improvements to the HVAC systems in museum exhibit areas; and consolidation and expansion of the archival storage space. Unfortunately, and despite this work, the inadequate size of the current storage facility and its lack of adequate temperature, humidity and dust controls prevent NPS from addressing the most serious preservation problems facing the collections. The provision of appropriate, climate controlled and secure storage space is one of the major goals of this GMP/EIS.

**aaa** General Management Plans do not address law enforcement issues such as looting and monument vandalism in the park. This is not perceived as a serious management problem because of the low number of reported incidents. Reports of relic hunting and vandalism in national parks are submitted publicly under another document called the Report on the Federal Archeology Program published by the Departmental Consulting Archaeologist, Archeology and Ethnography Program, National Park Service, U.S. Department of the Interior, Washington, D.C.

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| fff | 175 | 3.2.5 | Statement is made that Borough of Gettysburg supplies most of the water to GNMP. Please elaborate. How much water does GNMP use in a typical year? Precisely how much of this water comes from the Borough? What are the other sources of water used on GNMP? | |
| | 177 | 3.2.8 Last sentence | Sentence states that "The minimum requirement for new facilities for the storage of collections is that they be outside of the 500-year floodplain." Please identify which floodplain, if any, the present Cyclorama Center and Visitors Center are located in. | |
| ggg | 179 | 3.2.11 Last ¶ | I am surprised that a comprehensive survey of reptiles, amphibians and invertebrates has not been performed before this EIS. Such information is integral to the meaningful analysis of environmental impacts contained in this EIS. How will this information, once the survey is completed, be integrated into the GMP/EIS? | |
| hhh | 180 | 3.3.1 | This section concludes with the acquisition of the Rosensteel Collection and Building in 1971. This section should be expanded to discuss changes and modifications performed to turn the Rosensteel Building into the current GNMP, including a summary of changes and modifications to the structure, installation of updated exhibits, with years that such work was performed, and financial contributions necessary. | |
| iii | 183 | First Sentence on page | Statement is made that park is closed between 10 PM and sunrise, and that most activity is day use. If the park is closed between 10 PM and sunrise, isn't ALL activity day use? If there are night programs and night uses, this sentence should be re-written, and exceptions to day-use should be identified and described. | |
| jjj | 185 | Second ¶ on page | Discussion is presented of crowding at Visitors Center, and lack of sufficient contact points. One possible remedy to this situation, which could be implemented under the present GMP and as Alternative A of this GMP/EIS, would be the re-opening of the Emmitsburg Pike's South Guide Station, which has been closed for many years. This would add an additional visitor contact station with minimal cost to the taxpayers. | |
| | 186 | Third ¶ on page | GMP notes that Eisenhower NHS interpretation and shuttle service are operated from the GNMP Visitor Center. One possible remedy to overcrowding of the Visitor Center would be to move Eisenhower NHS interpretation and shuttle service to the Cyclorama Building, which is currently under-utilized. | |
| | 190 | 3.4.2 Last ¶ in section | Statement is made of great growth expected in Adams County. A brief discussion of the reason for this trend should be provided, to assist general public in comprehending future development threats to GNMP. | |

**bbb** The two amounts are two different types of income. The $33,000 is what the park currently receives from the permittees because of the leasing of crop fields and pastures. This number is based on the acreage owned by the park that was leased to local farmers in 1998. The $300,000 is the estimated crop income produced as a result of the farming and selling of crops from the leased land within the park; the park does not receive any of this money, which goes to the farmers. This estimate comes from the 1994-97 reports *Gettysburg National Military Park and Eisenhower National Historic Site Economic Impact on Gettysburg and Adams County*. The citations are listed in Appendix 1 under McAvoy (1994), Becker (1995), Becker (1996), and Becker (1997).

**ccc** Because the examples were not intended to be all-inclusive we did not mention McPherson's or Seminary Ridges in the battle narrative associated with subsection 3.2.2 Geology (page 173). However, to avoid the appearance that only the three cited ridges were significant in affecting the battle, we will edit the specific sentence to indicate that they are merely examples of many other similarly significant geologic features.

**ddd** Although we acknowledge that the temperament and training of particular officers often influenced whether or not breastworks were erected along a defensive battle line, we believe that the conclusions made in the first paragraph of subsection 3.2.2. (Geology) are valid. Although Culp's Hill had substantial breastworks it did not have substantial "entrenchments." The breastworks at Culp's Hill were primarily of rock, logs, and fallen trees built or felled on top of the ground. The lunettes at East Cemetery Hill were likewise not all earthen but a combination of rocks, rails, and boards as well. The walls erected at Big and Little Round Tops and the rail works along Stannard's brigade front are other indications of defense works that were constructed on top of the ground surface because soil conditions impeded any entrenching. In fact, a number of Union regimental accounts (particularly in Gibbon's Division) specifically mention the paucity of defenseworks because of the impossibility of digging and getting enough soil to make an effective barricade.

**eee** The final two sentences of the first paragraph have been reversed and now read, "Many of the park's historic buildings use this local stone. Residual clay deposits have been mined to make bricks and tiles."

| | COMMENTS | | | RESPONSES |
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| | 190 | 3.4.3 | Local Economy section lacks details of GNMP's contribution and standing to the local economy. Should discuss what % of workforce is employed by GNMP (directly and indirectly), and what % of local economy is contributed by GNMP (directly and indirectly), and what % of tourism is GNMP (including other sources of tourism revenue in local economy by %). This information, although presented in other sections of the document in part, should be presented in detail in this section. | |
| | 191 | Second ¶ on page Last sentence in ¶ | This sentence, beginning "However, in the end.." should be deleted. It contributes little to the GMP/EIS and is confusing. | |
| kkk | 192 | Table 23 | Properly, Visitor Expenditures are not Direct Contributions. Rather, they are Indirect Contributions. According to proper economic definitions, only $ contributed by GNMP are direct. Visitor Expenditures certainly should be reported on this table, but should be reported as "Indirect Contributions." | |
| lll | 192 | Table 23 Crop Income | Crop Income is here provided as $300,000 for 1995, and $320,250 for 1996. On page 172, Section 3.1.5, Second ¶ statement is made that crop income is "more than 33,000." Which figure is correct? Please make change(s) as appropriate? | |
| | 192 | Table 23 | It is my understanding, based upon this document and previous documentation released by GNMP, that income from the crop program and Eastern National are returned to the park, and are then used to fund their operating programs. Please verify that the crop income and Eastern National figures are not counted twice in this and subsequent tables. | |
| mmm | 192 | Table 23 | Although all contributions by GNMP to the local community are provided, no provisions are made for estimating services from the Borough of Gettysburg and adjacent townships for services provided to the park (e.g. law enforcement assistance, fire and ambulance protection, increased road maintenance and law enforcement requirements because of great amounts of traffic generated by GNMP, etc.). Some adjustment should be made in this table, and all analysis in this document, to assess the total financial impact (both positive and negative) of GNMP to the local community. | |
| | 193 | 3.4.5 First ¶ | Please provide estimates for bed and breakfast rooms available at Gettysburg. If included in the 1,400 total, please elucidate. | |
| nnn | 193 | 3.4.5 Second ¶ | Accurately, the "trolley service" at GNMP is not a true trolley. Rather, it is a diesel-engine powered bus. Please correct sentence to read "bus service." | |
| ooo | 195 | 3.4.7 | This section needs to be completely revised. There is absolutely NO discussion of GNMP utilities, utility requirements, utility sources, etc. The information in this section is insufficient to assess environmental impacts caused by GNMP proposed actions. | |
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**fff** The draft GMP/EIS states that the Borough of Gettysburg supplies most of the park's water. It should state that Gettysburg Municipal Authority (GMA) provides most of the park's water. GMA is the public utility that supplies the Borough of Gettysburg and the surrounding townships with water. This water comes from a number of wells drilled and maintained by GMA throughout the local area. GMA also uses surface water from Marsh Creek to supplement the groundwater supplies. The amount of water the park uses each year could not be determined precisely; however, there are 21 facilities that use water from GMA. Some of these are the Visitor Center, Cyclorama Center, maintenance facilities, and the 6 comfort stations located throughout the park. In FY 98, the park used approximately 450,000 gallons of water from GMA. In addition, many of the historic structures that are used as resident quarters have wells. There are no records for past usage, and there are no means of monitoring the use of these wells.

There are few other sources of water available. GMA is requesting a permit from the Pennsylvania Department of Environmental Protection to increase the amount of water they are taking out of Marsh Creek to supplement their current supplies. The only other available water sources in the park are 3 wells at Eisenhower National Historic Site. These are currently not used but could be used for park purposes.

**ggg** Part of the basic information needed for each park are inventories for the major taxonomic groups, i.e., plants, mammals, birds, amphibians, reptiles, and fish. However, few if any parks have all their faunal and floral inventories completed and the parks that have one or two groups inventoried are fortunate. The primary reason why these studies are not completed is the lack of funding. Gettysburg NMP has good information on plants, mammals, and birds, and a herpetological survey is underway, but only antecdotal information is available for the other groups. Invertebrates are typically not included in parkwide surveys. These surveys typically take 2-5 years to complete. Additional surveys to complete data gaps at Gettysburg NMP are planned but would not be completed until after the GMP has been finalized; however, the information that was available was sufficient for analysis of the draft GMP/EIS alternatives. The additional surveys that are underway or planned would be available to be used in the development of implementation plans and completion of any required compliance for the various projects identified by the draft GMP/EIS.

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| | 196-197 | 3.4.9 | I am concerned that one of the single greatest adverse changes to the historic battlefield topography is not discussed in the GMP/EIS. Specifically, within the past decade Gettysburg College destroyed a historically and topographically significant component of East Seminary Ridge, disturbing and moving interpretive battle monuments, and causing severe erosion problems. This ridge destruction should be discussed in detail in this portion of the GMP/EIS. |
| | 196-197 | 3.4.9 | It should be noted that another contributing factor to the siting of the Cyclorama Building was the desire to have the visitors experience the same perspective as the painting. In point of fact, the viewing area atop the building was designed with this in mind. |
| | 196-197 | 3.4.9 | It is of great concern that the stone gabion wall constructed to impede erosion at the East Seminary Ridge Railroad Cut is highly intrusive, and is also not serving to preclude erosion. This is both a conservation and cooperative planning effort that is necessary not only to conserve a historic area outside of the park's boundary, but also to prevent direct erosion damage to GNMP battlefield resources. Please note that on Figure 16, this area shows up as either being visible from 3 to 8 interpretive points, or from 9 to 16 interpretive points (the shading on this figure is inadequate for me to be certain). Past, and proposed, efforts by GNMP to resolve this issue must be directly addressed in Alternative A (No-Action), and should be evaluated in Section 4.0 (Environmental Impacts) of this EIS. |
| ppp | 198 | 3.5.1 | Please provide where the nearest air, rail and bus service to GNMP and Gettysburg/Adams County are located. |
| qqq | 198 | 3.5.2 First ¶ of section | Please provide total "vehicles per day" for both GNMP and Borough of Gettysburg/surrounding townships. This will facilitate evaluation of this environmental impact. |
| rrr | 199 | Third ¶ on page Taneytown Road | Although "vehicles per day" is provided for all other roads, it is not provided for Taneytown Road. Please provide this data. This will facilitate evaluation of environmental impact(s) to local and park traffic. |
| sss | 200 | 3.5.3 Second ¶ in section | Definitions of Traffic Levels of Service A-F are insufficient. Please expand narrative definition and provide table that quantifies these Traffic Levels. |
| | 200 | 3.5.3 Fourth ¶ in section | It should be noted that the traffic congestion on Route 15 (Steinwehr Avenue) is almost entirely due to the presence of GNMP. |
| ttt | 201 | Table 24 | Figures only add up to 95%. Where do the remaining 5% of visitors approach from? |
| uuu | 201 | Table 24 | It is not specified if "US Route 15" provided here is Business Route 15 (Emmitsburg Road) or US Route 15. Please elucidate. |
| | 201 | Table 24 | Routes 134 (Taneytown Road), and 116 (Hagerstown Road) are not represented in this figure. |

**hhh** We agree with your suggestion to expand to some degree the concluding sentence in subsection 3.3.1 concerning the transition of the Rosensteel building to the park's visitor center. We will incorporate your suggestion into the final document.

**iii** The statement on page 183 is correct as it is written. The majority of the visitor use of the park is day use as the park is closed from 10pm until sunrise. However, camping overnight in the park is allowed by permit only in the Youth Group Campground and infrequently by living history providers.

**jjj** The NPS concerns with overcrowding in the two main Visitor Centers (Museum and Cyclorama Center) are detailed in a number of places in the draft GMP. The most telling statement (page 87) indicates that the current Visitor Center and Cyclorama Center combined are sized to accommodate approximately 450,000 visitors a year while the current Visitor Center alone receives over 1 million visitors a year. While the NPS appreciates your thoughts on the use of the South End Guide Station as a remedy to our overcrowding, visitors come to our Museum/Visitor Center to receive information and to explore the exhibits. This pattern would not change with the addition of approximately 200 square feet of visitor contact space at the Guide Station.

**kkk** You are correct that some people use the definitions you cite for direct and indirect contributions. However, the Chamber of Commerce annual reports on the economic impacts of the parks on Gettysburg and Adams County define Visitor Expenditures as direct contributions. Since these reports provided the basis for the information in the draft and final GMP/EIS, they also define Visitor Expenditures as direct contributions for consistency.

**lll** The two amounts represent two different types of income. The $33,000 is what the park currently receives from the permittees because of the leasing of crop fields and pastures. This number is based on the acreage owned by the park that was leased to local farmers in 1998. The $300,000 is the estimated crop income produced as a result of the farming and selling of crops from the leased land within the park; the park does not receive any of this money,

| | COMMENTS | | | RESPONSES |
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| | 201 | 3.5.5 First ¶ on section | Discussion is presented in this paragraph in regards to issues at the Visitor Center/Cyclorama parking lots. Certainly, based upon personal observations, this is a serious and legitimate concern. However, GNMP during 1997-1998 modified the Visitor Center parking lot, effectively reducing parking there. This parking lot modification should be presented in detail under the No-Action Alternative (Alternative A), including the specific modifications, changes (to/from) in parking availability, cost, and other specifics of this modification | which goes to the farmers. This estimate comes from the 1994-97 reports *Gettysburg National Military Park and Eisenhower National Historic Site Economic Impact on Gettysburg and Adams County*. The citations are listed in Appendix 1 under McAvoy (1994), Becker (1995), Becker (1996), and Becker (1997). |
| vvv | 202 | Table 25 | "Average Percent" only equals 87%.<br>"Typical Sunday March 1996" only provides information for 4,396 visitors.<br>"Typical Sunday July 1996" only provides information for 9,975 visitors.<br>"Typical Saturday, Oct. 1996" only provides information for 8,480 visitors.<br>Please revise table, and/or provide explanations as appropriate. | **mmm** The kind of analysis suggested, although typical for new subdivisions and other new calls on municipal infrastructure, is not believed by NPS to be necessary in this case. The park has long been established and little additional impact on these services as a result of the proposals in the draft GMP/EIS are projected. NPS provides its own road maintenance and law enforcement. Fire and ambulance protection are already provided by local municipalities and volunteers. NPS, through a federally funded sewer improvement project currently under construction and a fire suppression project scheduled for 2001, is paying for improvements to infrastructure. The new impacts to infrastructure you suggest would be minimal. |
| www | 202 | Table 26 | "Percentage of Daily Arrivals" only equals 87%.<br>"Percentage of Daily Departures" only equals 73%.<br>I do not understand the methodology behind this table.<br>If 90 vehicles arrive 8-9 AM and none leave, and 200 vehicles arrive between 9-10 AM and none leave, there should be 290 vehicles in the parking lot. The Table only shows 200.<br>According to my estimations, the current "vehicles in lot total" should be:<br>9-10 AM 290<br>10-11 AM 415<br>11-Noon 475 etc.<br>Please revise table, and/or provide explanations as appropriate. | **nnn** The term "diesel powered" has been added to the beginning of the sentence to clarify it in the final GMP/EIS. |
| | 203 | 3.5.7 | Please provide %s of visitors that use licensed guides, and audio tapes (information should be available). | **ooo** Environmental impacts caused by proposed actions in all alternatives of the draft GMP/EIS are discussed in Chapter 4. There are no proposed facilities that would impact local utilities over and above existing impacts. The proposed new museum complex would have little impact upon regional utility capacities or infrastructure, because the structures that it would replace would be removed. |
| | 204 | 3.5.7 Third ¶ on page | Statement is made that NPS is dumping gravel to preclude erosion, resulting in adverse environmental and visitor impacts. Why does GNMP not rigorously enforce parking requirements with law enforcement personnel? Again, this suggests the need for this GMP to incorporate an expansion of law enforcement at GNMP. | |
| | 205 | 3.6.1 | One of the implied purpose & need statements is that GNMP needs to consolidate its administrative offices. Please provide specifics on what structures are used, where they are located (on a map), how many staff maintain offices there, etc. Specifics will facilitate effective comprehension and review of this document. | **ppp** There is no commercial plane, train or bus service to Gettysburg or Adams County. The nearest facilities are in Harrisburg, PA, approximately 45 miles north of Gettysburg. This information can be found on page 198 of the draft GMP/EIS. |
| | 205 | 3.6.2 First ¶ | The entrance guide station on the Emmitsburg Road south is closed, and has been closed for many years. It should not be included as a public facility here, unless GNMP intends to re-open it in the near future. If so, environmental analysis for this action must be included in the EIS. | **qqq** The information you have requested, the number of vehicles per day for the Borough of Gettysburg and surrounding townships, is not available. It will be developed as a part of the comprehensive traffic and transportation study that |

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| | 205 | 3.6.2 Second ¶ | Please provide a map that depicts the location of the Youth Group Campground, and the extant horse and nature trails at GNMP. One of the proposed actions involves a significant change to the recreational horse trails at GNMP, and specifics will facilitate effective comprehension and review of this action. |
| xxx | 206 | Figure 29 | Typographical Error. "McPhereson's Ridge" is spelled incorrectly. Spelling, as used correctly throughout this GMP/EIS is "McPherson's Ridge." |
| | 206-207 | Figure 29 | Two greatest impacts to cultural resources in 1997 should be noted on this map. Destruction of a significant portion of East Seminary Ridge, and the National Tower on Cemetery Hill. |
| yyy | 206-207 | Figure 29 | The symbol for "Trails, Walks, and Paths" is so small that I have difficult reading and following them on this figure. Please change this symbol to enhance clarity. |
| zzz | 206-207 and 208 | Figure 29 and Third ¶ on page | Although it is stated that an area experiencing unacceptable levels of resource impact is Culp's Hill, Figure 29 does not indicate any impacts to this area (foot traffic impact is identified for Spangler's Spring area). Please elucidate. |
| | 208 | Fourth ¶ on page | Statement is made that Commercial horse tours have caused damage to areas of the battlefield. The question, of course, is why has not GNMP prohibited commercial horse tours from the park boundaries? I have not seen, in any of the proposed actions and alternatives, any discussion of this apparently necessary action. |
| aaaa | 218 | 4.2.4 | Statement is made that "GNMP is the primary reason for visitation to Adams County." This statement is probably not accurate, as Gettysburg College, the Agricultural Industry (particularly fruit), and the Adams County Courthouse all attract significant visitation to Adams County. A statement that "GNMP is the primary reason for tourist visitation in Adams County" is probably accurate. |
| bbbb | 221 | 4.3.1 Third ¶ on page last line | Typographical Error. A period (".") is missing from the end of this line. |
| cccc | 231 | Visitor Expend-itures | General Comment- All Evaluation for Alternative A, No Action Alternative. Assessment is that "Direct visitor expenditures are forecast to decrease slightly over time, because of the slow erosion of attendance forecast as a lack of reinvestment" for the No-Action Alternative. In fact, visitor attendance at GNMP has continuously increased, regardless of the present "lack of reinvestment" on the part of the National Park Service. I recommend that all of the findings derived from this assumption should be revised. |
| | 232-233 | Tables 29-30 | Areas marked "Decrease" should be marked "Slight Increase" for both tables, per previous comment for p. 231. |
| dddd | 234 | Table 31 | Since the No-Action Alternative implies no changes to the park, I do not understand why this Table has changed from Table 25. |
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will be undertaken by the Pennsylvania Department of Transportation beginning in 1999. However, NPS does not consider that this level of detail is needed to analyze impacts for this draft GMP/EIS. The information will be available from the comprehensive traffic and transportation study when NPS develops the necessary implementation plans.

rrr The information you have requested is not available. It will be developed as a part of the comprehensive traffic and transportation study that will be undertaken by the Pennsylvania Department of Transportation beginning in 1999. However, NPS does not consider that this level of detail is needed to analyze impacts for this draft GMP/EIS. The information will be available from the comprehensive traffic and transportation study when NPS develops the necessary implementation plans.

sss Here is the table you requested.

| Level of Service | Description | Average total delay per vehicle (Seconds) |
|---|---|---|
| A | Very short delay, good progression: most vehicles do not stop at intersection. | 0 to 5.0 |
| B | Generally good signal progression and/or short cycle length: more vehicles stop at intersection than Level of Service A. | 5.1 to 10.0 |
| C | Fair progression and/or longer cycle length; significant numbers of vehicles stop at intersection. | 10.1 to 20.0 |
| D | Congestion becomes noticeable: individual cycle failures; longer delays from unfavorable progression, long cycle length, or high volume/capacity ratios: most vehicles stop at intersections. | 20.1 to 30.0 |
| E | Usually considered limit of acceptable delay: indication of poor progression, long cycle length, or high volume/capacity ratio; frequent individual cycle failure. | 30.1 to 45.0 |
| F | Could be considered excessive delay in some areas, frequently an indication of saturation (i.e., arrival flow exceeds capacity) or very long cycle lengths with minimal side street "green" time. Capacity is not necessarily exceeded under this level of service. | over 45.0 |

## COMMENTS

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| eeee | 234 | Table 31 | As with Table 25, the numbers of parking spaces do not equate to the vehicles in/out for this table.<br><br>9-10 AM should be 205 total vehicles, not 204 as shown.<br>10-11 AM should be 375 total vehicles, not 380 as shown.<br>etc.<br><br>This holds true for all subsequent tables providing this data. |
| | 234 | Table 31 | General Comment- Chapter 4.0 (Environmental Impacts). It is difficult to correlate the information for parking spaces provided in Chapter 3.0, Affected Environment with the analysis presented in Chapter 4.0, Environmental Impacts. The format of information presented has changed. Chapter 3.0 presents total vehicles. Chapter 4.0 presents vehicles separately assessed as buses and automobiles. Please insure that formats are consistent between these chapters. |
| ffff | 238 | Historic Structures First ¶ | It is my understanding that the Keeper of the National Register of Historic Places, National Park Service, U. S. Department of the Interior has made a determination that the Cyclorama Building is eligible for the National Register of Historic Places because of its great architectural significance. Obviously, this completely changes the environmental analysis in this paragraph. Please revise this paragraph, and your analysis, in accordance with this new determination. |
| gggg | 239 | Archeol-ogical Resources | I believe that a Phase I study of the site of the proposed GNMP/Kinsley Visitor Center is inadequate for a large battlefield such as Gettysburg, where the entire battlefield is in effect an archaeological resource. For every new construction at GNMP, now or in the future, a full archaeological recovery effort using metal detector volunteers supervised by professionally qualified archaeologists has the potential to yield great and significant data on the Battle of Gettysburg. Chickamauga and Chattanooga National Military Park performed such a survey for small portions of the park impacted by new highway construction, and the information gathered by this effort was a great contribution to CCNMP's knowledge and interpretation of the Battle of Chickamauga. I strongly suggest that such an archaeological mitigation be clearly identified in this EIS, and in any ROD. |
| hhhh | 241 | 4.4.2 Prime and Unique Farmlands | 40 CFR § 1502.16 (c) states that "Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned." The EIS states that 10 acres of prime farmlands would be removed from agriculture by construction of the proposed GNMP/Kinsley Visitor Center. Adams County, as mentioned elsewhere in this document, has an effective program to preserve the agricultural industry and prime farmlands in Adams County. The Commonwealth of Pennsylvania has a similar program. The EIS fails to identify mitigations that will be taken to avoid conflicts between the proposed construction and these programs of Adams County and Pennsylvania. |

## RESPONSES

**ttt** The remaining 5% of visitors approach from all other local roads.

**uuu** The table refers to the Route 15 Bypass.

**vvv** The remaining 13% of visitors arrive before 8:00am or after 5:00pm. The chart includes only those visitors that arrive between 8:00am and 5:00pm. You are correct that the numbers do not add up to total visitation. This is because only 87% of the arrivals (i.e., visitors arriving between 8:00am and 5:00pm) are shown on the table.

**www** This table has been revised.

**xxx** The misspelling of McPherson's Ridge has been corrected in the final GMP/EIS.

**yyy** A heavier line symbol for "Trails, Walks and Paths" will be used in the final GMP/EIS.

**zzz** The top of Culp's Hill has a hatch pattern matching the legend category of "Foot Traffic Impacts Resources."

**aaaa** The word "tourist" has been inserted between "for" and "visitation" in the final GMP/EIS.

**bbbb** A period has been added to the last line of paragraph 3 in the final GMP/EIS

**cccc** The economic assessment completed for the draft GMP/EIS suggested that visitation would decrease in the next ten years if no actions to improve the visitor experience were taken by NPS. This was because of a number of factors, described on page 230 of the draft GMP/EIS. These include the increasing domination of the travel and leisure industry by major destinations, investments in other attractions and visitor infrastructure in the region and throughout the U.S., lack of marketing by NPS, and other factors. The

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| | 245 | First ¶ on page Last sentence | Statement is made that "There are currently no facilities in Gettysburg that interpret the civilian experience in Gettysburg." In fact, Main Street Gettysburg has been working very hard to install a well-interpreted walking trail from the Square through the historic community to the Visitor Center/Cyclorama area. This effort should be mentioned in this GMP/EIS, and it invalidates at least a portion of the statements made in this paragraph. |
| iiii | 247 | 4.4.5 First ¶ Last Sentence | The analysis presented in this section is woefully inadequate, for the reasons presented: "This analysis covers only vehicles traveling to and from the park, not the total traffic on the local roads." The traffic in the Borough of Gettysburg, and GNMP traffic, are one and the same. They are completely intertwined, and must be analyzed at the same time. This entire analysis must be revised to evaluate environmental impacts of the sweeping changes proposed in Alternatives B-D as they effect the entire community. |
| | 247 | 4.4.5 Third ¶ and Fifth ¶ | Statement is made in Third ¶ that "To the degree possible, bus traffic would be separated from automobile traffic in the Visitor Center complex." Statement is made in Fifth ¶ that "Some of the [parking] spaces would be designed to be shared [between buses and automobiles]. I am confused how the Visitor Center complex will have separated bus and automobile traffic lanes but shared parking spaces? Please resolve this discrepancy. |
| jjjj | 258 | Table 33 | An annual profit of $1,449,300 for the cafeteria would equate to the profit of most large restaurants, and few restaurants achieve such massive profits. No discussion is provided in the GMP for the management, operation and specifics of the operation of this cafeteria. I believe that such a profit is grossly optimistic, and the figure should be increased downward. |
| kkkk | 258-259 | Table 33 Table 34 | The figures used for visitor expenditures in the park do not correlate between these two tables. |
| | 258-259 | Table 33 Table 34 | Table 33 presents that visitor expenditures in the park represent 2.8% of their total expenditures. It is suggested that this will dramatically increase, approx. 300%, for Alternative B. This is wildly optimistic, and should be revised downward. |
| llll | 259 | Table 34 | This table (and elsewhere throughout the GMP/EIS) suggests that the new Visitor Center will result in increased attendance at GNMP. However, it should be noted that p. 182 states that "changes in interpretive fees for the Electric Map and Cyclorama Programs resulted in lower attendance at these programs." No such increase is stated for the Electric Map and Cyclorama Program, according to p. 99. However, the interpretive film is currently shown free in the Cyclorama Center. In the new Visitors Center, the interpretive film will require a $4.00 fee according to p. 99. I believe that, although the new Visitors Center will attract additional visitors to GNMP, that the suggested 6% increase in attendance is over-optimistic. Previously, the addition of fees at GNMP has resulted in lower rather than higher attendance. |
| | | | |

analysis suggests that the increases in visitation seen at Gettysburg NMP in the last decade may have been driven by media exposure from films and television series, and by general market growth, factors that are expected to dissipate. In any event, the purpose of the draft GMP/EIS is to protect resources and provide for visitor enjoyment and that decreases or increases in levels of visitation are not motivating factors for developing the GMP alternatives.

**dddd** The economic assessment of the no action alternative predicts that by 2007 there would be lower visitation to the park. This changes the parking requirements from the current conditions.

**eeee** The information in this table is based upon a detailed analysis prepared by the traffic consultant, and the numbers of vehicles entering and exiting the park cannot be added and subtracted to determine the number of parking spaces required. Vehicles entering the visitor center would stay for different lengths of time depending on the visitor's use of the center. Of the total number of vehicles entering the visitor center lot, some stay a short time, others for a medium length of time, and some for a long time. The numbers of vehicles left in the lot is based upon the percentages of vehicles staying for different lengths of time. Other small differences are because the numbers have been rounded.

**ffff** On September 24, 1998 (40 days after the draft GMP/EIS had been released for public review), the Keeper of the National Register did determine that the Cyclorama Building was eligible for listing in the National Register of Historic Places. The environmental analysis has been revised accordingly.

**gggg** The Phase I/II survey of the proposed museum complex site (which is privately owned) was conducted according to the standards of the Pennsylvania Historical and Museum Commission. All current and future NPS archeological work will continue to meet or exceed these standards. Any construction or disturbance activity on NPS lands within the boundary would be preceded by an archeological survey. If any unknown resources are uncovered during construction or ground-disturbing activity, procedures to implement section 106 of the National Historic Preservation Act and, as appropriate, the Native American Graves Protection and Repatriation Act, would be instituted.

## COMMENTS

| | | | | |
|---|---|---|---|---|
| mmmm | 259 | Table 34 | Footnote states that estimated visitor expenditures are higher than the figures provided by the *Adams County Economic Impact Report*, which is the source document used elsewhere in this GMP/EIS. No explanation for this higher visitor expenditure is provided, and is necessary to comprehend the figures presented in this table. Additionally, the new source for this visitor expenditure figure should be provided. | |
| nnnn | 259 | Table 35 | It is noted that under Alternative B, Retail and Amusement is expected to "Potentially Decrease." I could not locate any narrative elucidating this statement, please explain rationale behind this assessment. | |
| oooo | 260 | Table 36 | Under Park and Related Operations, Crop income is noted as remaining "Stable." In fact, the sweeping agricultural changes proposed under Alternatives B-D will eliminate or severely inhibit modern agriculture from GNMP. Income from agricultural operations, when the proposed changes are implemented, are almost certain to result in a "Decrease" in income to GNMP. | |
| pppp | 260 | Table 36 | Under Tax Effects, Real Estate taxes are noted to remain "Stable." Note that land parcels slated to be returned by GNMP to the community in accordance with the 1990 Gettysburg Boundary Legislation will not be returned according to this GMP. Alternatives B-D entail the removal of many acres of land from the local tax base. These changes alone will result in a "Decrease" in Tax Effects for Real Estate. | |
| qqqq | 264 | 4.5.6 Last Sentence | It is noted that "Additional Staff would be hired." However, please provide specifics- how many additional staff, at what pay levels, performing what specific duties? | |
| oooo (cont.) | 284 | Prime and Unique Farmlands | I disagree with the assessment made that "No new impacts" are identified as resulting from the sweeping change of GNMP from its modern agricultural program to a historic agricultural program. I favor such a change. However, the impact that this will have upon some local farmers and the Adams County agricultural industry must be addressed. Realistically, modern farmers will have difficulty adhering to many of the provisions of a historic agricultural program as presented in this GMP. Such an impact, and mitigations, to the agricultural programs of Adams County and Pennsylvania should be addressed here. | |
| | 288 | 4.7.4 Other Related Economic Impacts | I disagree with the assessment made that "No new impacts" are identified as resulting from the sweeping change of GNMP from its modern agricultural program to a historic agricultural program. I favor such a change. However, the impact that this will have upon some local farmers and the Adams County agricultural industry must be addressed. Realistically, modern farmers will have difficulty adhering to many of the provisions of a historic agricultural program as presented in this GMP. Such an economic impact, and mitigations, to the local farmers who utilize GNMP agricultural land should be addressed here. | |

## RESPONSES

**hhhh** The General Management Plan (GMP) is a framework plan and its purpose is to outline the park's goal for the next 10-20 years. The GMP is not meant to provide solutions to all issues that would arise as a result of the implementation of the plan. When it is needed, implementation plans may be developed for specific projects. This is the case with the proposed Visitor Center and its effect on prime or unique farmlands. The procedure that would be followed is outlined in the draft GMP/EIS in Section 4.4.2, Prime and Unique Farmlands. That section notes that a "Farm Conversion Impact Rating and Land Evaluation System Report would be completed before any work begins." The NPS would assess the impacts and coordinate with all appropriate federal and state agencies on the impacts of the project.

**iiii** NPS considers that the analysis is adequate for understanding the impacts as a result of the alternatives discussed in this draft GMP/EIS. It analyzes the changes created by NPS actions, not the changes that may result from the actions of others. NPS is cooperating with the comprehensive traffic and transportation study that is being undertaken by the Pennsylvania Department of Transportation in 1999. It will analyze and recommend projects to improve traffic flow and safety for locations in and around Gettysburg and the townships surrounding Gettysburg National Military Park. This comprehensive traffic and transportation study should provide the information you suggest.

**jjjj** The figure you refer to is gross estimated income, not profit.

**kkkk** The difference in per capita spending between these two charts is because Table 33 describes per capita spending only of visitors to the visitor center, while Table 34 describes per capita spending of all visitors to the park.

**llll** The analysis conducted by the Office of Thomas Martin indicates that the projected expenditures are reasonable. The complete analysis is available from the Superintendent, Gettyburg NMP.

| | | | |
|---|---|---|---|
| | 299 | 5.3.1 | I am surprised that the Congressional distribution of this GMP/EIS is so limited. The public/private partnership program, resulting in the GNMP/Kinsley Visitor Center, has the potential to effect the entire National Park Service system. Accordingly, full distribution of this Draft GMP/EIS to the entire U. S. Congress should have been made. I strongly urge such distribution on all future versions of this document. |
| | 299-300 | 5.3.2 | I was surprised to see that such prominent Civil War preservation organizations such as the Civil War Trust and HERITAGEPAC are not listed on this distribution list. I strongly urge such distribution on all future versions of this document. |
| rrrr | 299-300 | 5.3.2 | Although I noted exemplary coverage of bicycle organizations, I did not notice a single equestrian organization listed in this document. This GMP will have great repercussions to the equestrian community who utilize GNMP for recreational horse riding. I strongly urge such distribution on all future versions of this document. |
| | 300 | 5.3.4 | I am surprised to note that no distribution of this GMP/EIS was made to either Pennsylvania or Maryland state legislatures. The proximity of GNMP to Maryland certainly has an economic impact to portions of Maryland, and activities at GNMP are obviously of great interest to Pennsylvania state legislators. I strongly urge such distribution on all future versions of this document. |
| | 300 | 5.3.4 | I note no distribution to the Maryland state government. The proximity of GNMP to Maryland certainly has an economic impact to portions of Maryland. I strongly urge such distribution on all future versions of this document. |

**mmmm** A description of the visitor expenditure figure you reference is included in the draft GMP/EIS on page 219. The visitor spending estimate was taken from the 1994 visitor survey of $68 per visitor which was judged to be the most accurate visitor spending estimate available for use in this analysis.

**nnnn** The analysis conducted by the Office of Thomas Martin indicates that the projections are reasonable. The complete analysis is available from the Superintendent, Gettysburg NMP.

**oooo** In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed and should therefore result in stable farm income.

Before any changes are made to the agriculture program, an implementation plan would be completed. The development of this plan would be in coordination with the park's resource management, interpretative, and maintenance staff, the current farmers who lease the land, and all the appropriate state and federal agencies. This plan would outline what changes would be made to the program, how the changes would be phased in, and what effects the changes would have on soil conservation, wetland restoration, the income the park receives from the farmers, and the income the farmers receive from selling their crops.

## COMMENTS

Enclosure 2

Reproduced from:

"Battle Lines, The Official Newsletter of the Gettysburg Battlefield Preservation Association, Founded in 1959" Vol. 6, No. 1 (Summer, 1998), pp. 19-20.

"Viewing The Old Visitors Center"

Much has been said by Superintendent Latscher about the deteriorating conditions in the old Rosensteel Museum. Four members of the GBPA were permitted to go on a brief tour on March 21st (1998). It lasted for a half hour and questions were to be asked only at the end. Two members of the NPS staff lead the tour through the "poor" storage area and highlighted conditions. Colonel McClain, G. Craig Caba, John Fenstermacher, and congressional republican candidate, Charlie Gerow viewed the area. Although it is not a state of the art designed building, the group of concerned citizens were shocked to learn that the NPS does not use dehumidifiers. The group jointly agreed conditions could be made far better with a little effort by the NPS at modest cost.

ssss

At the end of the tour the assistant curator displayed a gray kepi with moth damaged front. He emphatically stated that Harpers Ferry NPS examined this piece and said it will cost $6,000 to restore this rare Confederate piece. This was thus offered as a token example of the deterioration of priceless relics as we all have been reading about in Civil War News. Mr. Gerow questioned what the piece looked like when Mr. Rosensteel obtained it, as the damaged area was only in the front. The curator stated that it probably looked much like it does now, but humidity does not help textiles. Mr. Caba, owner of the other institutional Gettysburg collection pictured in Time-Life's book and an authority on Confederate headgear, questioned in a helpful way, why it should be restored. He sited two thoughts: 1.) it is a relic and to reconstruct a relic and make it into a pristine artifact is problematic, 2.) why would anyone spend $6,000 to restore a post-war kepi, probably used by the United Confederate Veterans or New York militia unit? Along this line, he continued to point to definite post-war aspects from visor construction, shape of the body of the cap, and fully describing the interior. The later, which Caba did not see but was entirely familiar from experience, caught the curator's curiosity and when he removed it from the modern head form to see the inside, it was the common post-war lining.

John Fenstermacher volunteered to purchase weather-striping for the rear exterior door to prevent moisture, bus fumes, and cold air from penetrating the storage area. The offer was rejected by the NPS. Other concerns revolved around the Park's old environmental building gauges. No curator could comment when the instruments were last checked for accuracy. Displaying a 1993 humidity/temperature chart was [not] unusual, when a current chart was not available. It was conceded that NPS at Fort McHenry did store weapons at Gettysburg for years. This point brings forth many questions, particularly- if it is so bad, isn't the NPS negligent in their duties to protect American historical resources?

Recently inquiries were made of the Pennsylvania Historical and Museum Commission about items loaned to the current Visitors Center. The response clearly indicates that conditions are within accepted ranges and have been monitored by Pennsylvania curators. The State feels their artifacts are not in danger from deteriorating conditions, as alleged by

## RESPONSES

pppp The administrative or legislative boundary changes recommended by the prescriptions common to all action alternatives individually have potentially positive, negative or neutral affects on the local tax base. Several parcels are owned by NPS, so administrative changes to correct boundary map errors would not affect local tax base. Recommendations for deletions from the boundary would likely have positive tax effects. Other administrative changes, such as adding the Battlefield Military Museum parcel to the boundary map to correct a previous error would not result in changes different from those contemplated by the boundary legislation. Adding the Wills House to the park boundary would allow NPS to undertake actions requested by the Borough of Gettysburg. NPS acquisition of the building would have a negative impact on local real estate taxes. However, the operation of the Wills House as a visitor venue could have a positive effect on amusement and other tax revenues. Therefore, this change could have a positive, negative or neutral effect on local taxes, depending on the specific operational configuration of the building. In all, local taxes should stay relatively stable. Section 4.4.4 of the GMP/EIS has been changed to reflect this information.

qqqq The purpose of a GMP is to set forth a basic management philosophy for a park and provide a framework for future decision-making. It is not intended to describe specific pay levels of additional staff or their specific duties.

rrrr The Civil War Trust is on the mailing list for distribution, and did receive a copy of the draft GMP/EIS. The distribution list will be corrected in the final GMP. To date, HERITAGEPAC has not asked to be included on the park's mailing list, although the Civil War Round Table Associates, a sister organization, did receive and comment on the draft GMP/EIS. Many horse trail users and representatives of user groups attended public workshops and commented on the draft GMP/EIS. Their comments are included in this volume.

ssss The environmental storage conditions within the collections storage area of the current visitor center are practically non-existent. There is neither heat nor air conditioning in the vast majority of the 6,000 square feet of storage space, which makes the temperature control for artifact preservation impossible. The entire 6,000 square feet area lacks humidity control, which makes it

Dr. Latschar; the letter was reviewed by the Pennsylvania Attorney General's Office on February 24th [1998]. Repeated requests for professional studies, citing specific examples of deterioration at GNMP, over a two year period have NOT been done. Perhaps our call for FULL DISCLOSURE [note: GBPA emphasis] may some day be heard and concrete facts may be presented.

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impossible to protect the artifacts from wide fluctuations in relative humidity. Finally, there is no air circulation system in the storage area. None of these problems can be solved in isolation. For example, the lack of temperature control is a major factor leading towards wide fluctuations in humidity. Likewise, it is impossible to provide heating and air conditioning (temperature control) without installing an air circulation system for the entire storage area. In 1988, the NPS estimated that the cost of correcting these basic environmental storage problems would be over $1.6 million (not including funds required to address any of the other storage deficiencies, such as lack of adequate storage space.)

The use of portable dehumidifiers would have a negligible effect upon these area-wide environmental deficiencies.

## COMMENTS

October 16, 1998

From:
Elizabeth Daniels

To
Superintendant John Latschar
Gettysburg National Military Park
Gettysburg PA 17325

Dear Dr Latschar:

Having spoken at your public meeting on October 1, I wish to follow up with additional comments and elaborations.

1) I am grateful for the presence of our Park and for the numerous benefits my family and I have enjoyed since 1954. On the whole I think it has been well managed, especially by the day-to-day work of the rangers. I have no financial interest in the Park. Although I am dubious about the part of this GM-Plan to move the visitor center and open it to private commerce, in this letter I will discuss other impacts of the Plan.

a 2) I don't think the Fantasyland area will work for maintenance buildings, at least not buildings concealed by trees, as the GM-Plan states. The Plan mentions draining dammed-up ponds; I suppose that means the Fantasyland one. Already there is considerable wetland in those woods. If anything, draining the pond will create more of the type of wetland that must be protected

3) I recall a GM-Plan generated a few years ago about the Commemorative Period. The gist of the publicity then was that **it is impossible to return the Battlefield to 1863**, so let's return it to the 1890's. Various actions were carried out, including mowing around monuments. However, now that you have decided **it is not impossible to aim at 1863**, I see no need to confuse the visitor with this emphasis. Existence of the monuments and their grassy access, plus a simple statement in the regular handout should be enough to convey the idea. How can you justify spending **nearly a million dollars on 13.3 miles of pipe-rail fences** to outline this

b Commemorative area? A detailed brochure could be available at the visitor center for people interested in this period.

## RESPONSES

### Elizabeth Daniels

a Currently, there are three man-made ponds in the Fantasyland area. The proposed new museum complex would not require removal of these ponds, although it is NPS policy to remove unused and potentially hazardous dams wherever possible. If NPS determined that the dams would have to be removed for public safety or other reasons, NPS would consult with the state and federal agencies that oversee wetland protection. The NPS would also follow its own wetland policy found in Director's Order 77-1. This would include a preparation of a Statement of Findings (SOF) for any affected wetlands. A SOF is comprised of a map that identifies the affected wetlands, a detailed description of the wetlands, a full disclosure of the adverse impacts to the wetlands, a description of alternatives to the project, a description of how the preferred alternative would minimize impacts to the wetland(s), and a description of proposed compensation, i.e., what wetland area(s) would be restored to compensate for any loss or degradation. The SOF would also include a map of the compensation area, a description of wetland functions to be restored, a description of the restoration process, the anticipated schedule for project completion, the anticipated timing for full wetland functioning, monitoring and maintenance requirements, and the funding source. The superintendent or his staff would develop the SOF in coordination with the Chief of the NPS Water Resource Division or a certified Wetland Scientist and with other appropriate state and federal agencies. The Regional Director has final approval of the SOF.

b The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new, modern design element into the Battlefield Commemorative Resource Area of the park.

c 4) Your statements on vultures are hopelessly inadequate. See pages 254 and 270 of your Plan. Turkey vultures aren't even mentioned, though their numbers relative to those of blacks have been declining in this area. Hasn't anyone read the Master's thesis Virginia Polytechnical Institute student John Coleman submitted in 1985 after spending the better part of two years here? He studied foraging and nesting habitat at the request of the Park. It is the nesting habitat that matters most, as they can fly considerable distances to find food. One of Coleman's conclusions was that nesting success for turkey vultures was endangered. **Both species use very specialized secluded habitat for nesting**. The rocky, wooded ridges of the Park--diabasic intrusions-- where they can find cavities among boulders to conceal their young, account for the fact that they nest here. This kind of habitat is rapidly disappearing as humans encroach upon it. Your Plan suggests leaving "... small clumps of mature trees around known nesting sites..." That couldn't possibly protect nesting vultures. I am enclosing copies of two of Coleman's illustrations showing where both species nested in the southern part of the Park, and where they foraged. **The nests are very hard to locate**. If someone is telling you they saw no nests, they probably weren't looking properly.

What do I recommend? At the very least, please extend the public comment period on this GM-Plan for several additional months.

Yours truly,

Elizabeth Daniels

Elizabeth Daniels

c Turkey vultures were considered in the development of the draft General Management Plan but were not mentioned specifically because they are not listed as species of special concern by the state. Because the roosting and nesting habitat for black and turkey vultures are similar, any management actions taken by the park to protect these habitats for black vultures would also benefit turkey vultures.

The park provides both nesting and roosting habitat. Coleman and Fraser (1985) found 14 vultures nests within the park boundary and 16 nests outside the park. The proposed plan to remove trees would only affect one or possibly two of these nest sites identified in Figure 7b (Coleman and Fraser 1985). The areas where most of the nests occur would not be affected by any tree removal proposed in the plan. At nest sites where tree clearing is proposed, a clump of trees would be left around the site to help preserve it. Park staff documented vultures' nests in 1995 and 1997 near one of the busiest areas of the park and in an area that is not completely wooded. Roost sites within the park are also important for the vultures. Traditionally, vultures have roosted in large white pine trees, and NPS would protect and retain white pine trees for vulture roosts.

## COMMENTS

Dear Dr. Latschar,

Please hear our plea. For all Americans, now and future. The General Management Plan for Gettysburg must move forward.

Sincerely,

Name Richard D. Dasch

Address

## RESPONSES

Richard D. Dasch

**Dear Dr. Latschar,**

Dear Sir;

As a member of Friends of Nat. Park of Gettysburg
And that the General Mangement Plan move forward.
I appreciate the opportunity of being heard.
And hope you will help push this along.

Sincerely,

Name Paul D. Davis

Address Mr. Paul D. Davis

**Paul D. Davis**

## COMMENTS

Richard Davis

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, Pa

Dear Dr. Latschar,

I support the preferred alternative. This Alternative goes a long way in preserving the resources of Gettysburg Park. While the preferred Alternative is acceptable, I urge the National Park Service to drop the movie from the museum plan. This will reduce the cost of the project by nearly 25 percent, thus eliminating the need for commercial loans and reducing the financial risks. This may allow donations of the faculty to NPS sooner than projected.

Gettysburg deserves the highest degree of preservation that the National Park Service can afford. This Alternative goes a long way to achieving the goal.

Sincerely,

Richard Davis

Richard Davis

## RESPONSES

### Richard Davis

Robert Del Bianco

Dear Sir

a I was not able to attend the public workshop at the Pittsburgh Green Tree Marriot on September 24 , however I would like to offer my comments regarding the commercialization of Gettysburg National Military Park.

My wife and I visit Gettysburg at least twice a year and already have seen too much commercialization ( junky motels, gift shops,bus tours). We bicycle the entire park which gives us a real connection to the events that happened there.We have seen people in Devils Den with folding chairs and picnic supplies which sends a message that the park might be viewed by many people as a"family fun" park. The park is a natural beauty as it is and should remain so. I would not be opposed to renovating the current visitors center in order to preserve and display additional artifacts. Ken Starr's investigation costs of the President could have paid for a complete renovation of the existing visitors center! Thumbs down on the private developer.

Regards

R. DelBianco



## Robert Del Bianco

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

Author: DDemots at NP--INTERNET
Date: 10/14/98 5:56 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: npca@npca.org at NP--INTERNET
Subject: GMP for Gettysburg NP
---------- Message Contents

Dear J. Latschar, Superintendent , GNP

I would like to register my support for the general management plan now under consideration . In arrangements like these, both now and in the future, the NPS must maintain ultimate control over the resources in the NP system. The goal should always be the preservation of the area involved in it's original condition. The Civil War was probably the defining event in testing our constitution and it's battlefields and historic sites must be preserved and protected from present day economic and population pressures.

Dennis De Mots

## RESPONSES

### Dennis DeMots

Mr. and Mrs. J. L. Denison

Oct. 7, 1998

Dear Mr. Hetscher,

we are in agreement that Alternative C seems to be an appropriate plan for the preservation of such an important historical event.

we are concerned about the use of the park for agriculture. we hope the acreage allowed for agriculture is not larger than the original was & that the "character" of the farming matches the original. we are also opposed to lethal "control" of wildlife including deer. ~~[illegible]~~ & other ~~non~~ lethal control of population should be used.

Sincerely,

Mr & Mrs J. L. Denison

## COMMENTS

Dear Dr. Latschar,

Please help me & all my friends to push the General Management Plan forward. Thanks & enjoy reading all our postcards!

Sincerely,

Name Carl Dietrich

Address

Carl Dietrich

## RESPONSES

Carl Dietrich

Author: at NP--INTERNET
Date: 10/16/98 4:52 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: My Comments on Gettysburg EIS
---------- Message Contents

Superintendent John Latschar
Gettysburg National Military Park
GETT_Superintendent@nps.gov

Dear Superintendent Latschar:

After reviewing the EIS, Alternative C would be my choice for implementation for Gettysburg National Military Park. It seems to answer my concerns best, including environmental concerns.

I hope that a small part of the museum will explain the natural history of the area, including pre-Civil War times and how it possibly affected humans in the area. I feel that an intact native ecology has a better effect on the outcome of the human condition, than when native ecology and natural processes are lacking.

I have very much appreciated the opportunity to comment.

Sincerely,

Marilyn Dinger

## Marilyn Dinger

## COMMENTS

Dear Dr. Latschar,

Please move the Gettysburg General Management Plan forward. We Americans must not forget our heritage. Thank you for your support.

Sincerely, Dan J. DiOrio

Name DAN J. DIORIO, MAJOR, USAF, RET

Address

## RESPONSES

Dan J. DiOrio

October 14, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

REF: Gettysburg General Management Plan
Public Comment

Dear Dr. Latschar,

Thank you for the opportunity to comment on Gettysburg National Military Park's Management Plan. I would first like to tell you how important Gettysburg has been to me throughout my lifetime. I recall visiting the park as young teenager and learning about the battle of Gettysburg and the great impact that the Civil War had on this great country that we live in. At the time, I recall seeing individuals touring the park on horseback and thinking that this would be the true way to visit the park and relive the past. As an adult, I have become quite a horseback riding enthusiast and have enjoyed many opportunities to ride the battlefield trails as an individual and as part of a private non-profit group. Just riding through the park, one can see the impact that horses had on the Civil War and on this battle in particular. A great number of the statues throughout the park include horses in their tributes. As one rides through the park one feels as if the battle could be underway right then and there! An indescribable feeling wells up inside as the horse(s) quietly move over the wood and field. Many children and adults touring the park on foot or by motor vehicle become quite excited and happy when they see folks riding through the park. It also gives them a feeling of the reality of the great battle the took place

Part of the Park's mission statement is *"to provide understanding of the events that occurred here,..."*. There is no greater way to *"understand"* than to *"understand"* on the back of a horse....the way so many of those who fought this battle *"understood"*.

a It is my understanding that much of the management plan was compiled as a result of various surveys that were conducted in the visitor's center. Those of us who visit the Park via horseback were, most likely, not represented in these surveys as the horse trailer parking is presently located at McMillan Woods, not near the visitors center. As a result, I respectfully request that you be sure to include consideration of the equestrian contingent that frequent the Park by including the following in your management plan:

b 1. If new equestrian trails are to be established, they must be interconnecting with one another, similar to what presently exists in terms of being accessible.



## Sharon L. Draper

a NPS used a variety of methods to gather information for developing the draft GMP/EIS between May 1997 and July 1998. These included numerous public workshops, meetings and hearings; and a series of newsletters mailed to 3,800 individuals and groups, offered as handouts and displayed in large (poster) format at our two main visitor centers and posted on our Web page. As reference documents, NPS also used a series of existing plans and documents including several visitor use surveys that had been conducted in the park over the past 10-15 years. While the most recent visitor use survey did not specifically target horse users, NPS did have input from horse users during development of the draft GMP/EIS.

b Chapter 2, Section 2.7.3, paragraph 4, line 21 of the General Management Plan states that NPS would provide limited non historic trails only where needed to connect historic lanes and provide loop circulation.

## COMMENTS

c 2 Parking that will accommodate horse trailers must continue to be provided within the Park itself and easily accessible to the trails. The Park should not depend upon a private concern to provide this type of parking as there is no assurance that a private concern would remain (i.e.; if the property is sold, unreasonable parking fees, etc.)

d 3. Riders should continue to be able to tour the battlefield trails unescorted by guides. If the Park feels that they must require this, mandatory guides must be limited to groups in excess of 20 riders. There must be no charge to non-profit groups for mandatory escort guides.

e 4 If new equestrian trails are to be established, the existing trails and access parking must remain in use until the new trails are opened

In order to maintain, protect our privilege to access the Park, as well as to maintain and protect the Park's landscape and historical value, private individuals and not-for-profit equestrian clubs need to be included in all stages of proposed management plan, from final planning, through implementation and beyond. This way we can work as a partnership with the Park to continue to provide the historical preservation and appreciation of the events that occurred on this hallowed ground. Gettysburg National Military Park will mean nothing to us if we cannot access it to learn!

Sincerely,

Sharon L. Draper

Sharon L. Draper

cc. The Honorable Barbara Mikulski, U.S. Senator
The Honorable Paul Sarbanes, U.S. Senator
The Honorable Roscoe G. Bartlett, U.S. Congressman
The Honorable Bruce Babbit, Secretary, Department of Interior
Donald J. Barry, Acting Deputy Assistant, Secretary, Department of Interior
Robert Stanton, Director, National Park Service
Marie Rust, Regional Director, National Park Service

Page 2 of 2

## RESPONSES

c The GMP provides a framework for future decision-making. Site specific decisions such as where horse trails would be located or where parking lots would be sited are normally determined in the next planning stage. Where, how large, etc. are questions that would be answered in the design phase.

d Private riders utilizing the horse trails within the park would continue to be able to tour the battlefield without a licensed battlefield guide. This service is available only if a visitor requests it.

e Existing trails would remain open until alternative trails are constructed unless park management decides that irreversible resource damage is occurring. Then, only that section where the irreversible damage is occurring would be closed. That decision would be independent of the relocation and construction of new trails.

## Robert M. Dunkerly

October, 1998

Dr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

After reviewing the Draft General Management Plan, I am pleased to see the amount of planing and effort that has gone into the document. I wish to voice my support for Alternative C, the proposed plan.

I feel that Alternative C is the only proposal which adequately and realistically addresses the current natural and cultural resource and visitor needs of the park. This alternative represents the best option for meeting the goal of protecting, preserving, and interpreting park resources for future generations

Below I will address various aspects of the plan which I feel are in need of attention:

-The restoration of the historic battlefield landscape is *critical* to the interpretation of battle areas, and will immensely increase visitor understanding of the engagement. Both the large scale and small scale restoration of features are important aspects in this objective. As a former park intern who has given interpretive programs on the battlefield, I can appreciate the potential that this improvement has to offer. Furthermore, I feel that preserving an 1863 landscape with commemorative corridors of monuments is not contradictory. These cultural landscapes are complimentary, as one helps to interpret the other.

-I feel that the restoration of historic features in the National Cemetery will benefit the visitor experience in this area. Along with this action, I believe that the park must also interpret the cemetery's role in the establishment of other National Cemeteries, as well as its role in battlefield preservation, commemoration, and memorialization. The park's mission is the protection and interpretation of the battlefield, and I do not wish to sidetrack this goal, yet I feel that this sub-theme is important in the National Cemetery.

-I strongly favor the current proposal for a new visitor center facility along Hunt Avenue. This change is critical not only for improved interpretation of the site, but also for improved collections care. The state of the park's collection is at a critical point, and I feel that a new facility is absolutely necessary. In addition the restoration of Zeigler's Grove will aid in the interpretation of this area behind Federal lines on Cemetery Ridge.

## COMMENTS

-I am very concerned about horse and pedestrian trails in the park I am certainly in favor of relocating the current equestrian trail and the addition of new hiking trails, yet I strongly recommend a plan, such as periodically rotating trails, to prevent the type of erosion which now damages the park.

-Coinciding with efforts to restore the historical landscape and farmsteads in the park I feel should be an effort to interpret these resources The park preserves many important examples of vernacular architecture and farmsteads, and I recommend interpretation of these farm buildings through waysides, brochures, programs or other means. I must emphasize that this should not take precedence over interpreting the battle, yet this would complement battlefield interpretation by shedding light on aspects of nineteenth century architecture and farm life. If the park is making an effort to restore and rehabilitate these features, they must be interpreted to be fully appreciated.

-At this point I tentatively agree that a limited shuttle system should be adopted during *peak* visitation periods to provide access to highly visited areas Introducing a bus system may have the potential to backfire: increasing traffic and noise that it intends to combat. I suggest a trial period to measure the effectiveness of this system Offering the shuttle on a limited basis during the summer season, and coordinating it with ranger programs will hopefully achieve the intended result

-Managing erosion along park avenues, primarily due to visitors pulling off the roads, must continue to be monitored. Despite room for parking along the avenues, visitors continue to drive off the pavement and onto the grass. Perhaps stricter ranger enforcement or unobtrusive obstacles would help accomplish this.

Again I reiterate my enthusiastic support of Alternative C It addresses the current threats caused by overuse and outdated facilities, and seeks to incorporate the latest historical research and preservation thinking into the management of the park.

I feel that with Alternative A the park would continue to lose ground in protecting cultural resources and that visitor needs would not be met with the quality that the Park Service intends. Alternative B is the next best to C, but I do not feel that it goes far enough in restoring aspects of the landscape critical to visitor understanding Alternative D is, as the document states, an unrealistic and contradictory goal. It fails to harmonize, as C does, the commemorative and historical aspects of the landscape.

I wish you success with your planning, and I look forward to seeing the Final GMP. I also look forward to seeing these exciting improvements in the park

Sincerely,

Robert M Dunkerly

## RESPONSES

Dear Mr.John Latschar, August 15, 1998

My name is Aaron E. Dunn and as a major preservationist and re-enactor, I am writing to many individuals to express my disappointing and depressed opinion against the degradation of the Gettysburg National Military Park's historic Baltimore and Hunt roads, and of it's surrounding and beautiful fields. My family's heritage is rooted from Dunnsville, Virginia in which they had fought in almost every battle of the civil war, including Gettysburg. By having a family rich in history and of course the civil war, we have a great, and deep passion for those few but very hallowed grounds. Of course a *civil war* is not intended, but please remember that there are always alternatives to this hazardous development because once it is gone, it is physically gone *forever*. Some ideas may include a donation system to be set up in libraries, schools, newspapers, and workplaces.

a As a member of the "*Friends of the National Parks at Gettysburg*," I am *totally against this* and I *do not support* this building proposal plan with *it being constructed* clearly *in the park's* historic *boundaries*. Upon hearing of the continual plans of a large museum, parking lots, theatre, gift shops, and a cafeteria, as a re-enactor, I could personally raise an "army" of petitioners *against* these destructive and truly heartbreaking actions.

Recently, I traveled to Fredericksburg, Virginia and Harper's Ferry, West Virginia. At the Fredericksburg National Park, I was amazed to learn that the visitor was charged admission to access the park for monument, fence, various historic preservation projects, and for independent reasons which I have found quite clever and productive.

Harper's Ferry. Truly an unique and historic experience, probably due to it's own unique landscape and tourist accommodations and layout. At Harper's Ferry, the tourist was "shuttled"from the visitor's center, which was *out* of it's historic boundaries a mile or so away, to the park itself to *avoid* such overcrowding and congestion in that small, significant, and very storied village that, unfortunately, *could very well happen* to Gettysburg.

We *cannot* allow the conviences of tourists to dictate how we manage nationally, significant lands. This is just another attempt to pave and modernize our national parks for fast-food and commercial developments and tourist conviences. What are we going to see and hear from now on from the Culp and Round Top hills from now on? Smog, traffic, congestion? Is it really and truly a necessity? It will definetly not look like what the real Generals Lee, Longstreet, Slocum, Chamberlain, and Sedgewick had once seen,( not what Jeff Daniels, Martin Sheen, and Tom Berenger seen). All gone for the convience of the tourist, forever. Today's soldiers "*WANT YOU*" (and need you) to act as a leader and supporter and to help encourage and lead *against this* very commercial development. Please remember, when you slowly choke off "little" bits and pieces of historic land, such as Gettysburg's, there are only going to be a "little" left for our future generations to learn, enjoy, and treasure. I pray that God may grant you the *knowledge*

## Aaron E. Dunn

a Through study of its landscapes and its history, NPS has prioritized the park's resources according to significance. Independent Civil War and battle historians have reviewed the results of these studies and generally have concurred with NPS' assessments. Although there was military activity on the proposed site, that activity was primarily support or movement in nature and was not significant; therefore, the site was not included in the Major Battle Action Area of the battlefield. There were, however, important artillery positions on topography adjoining the development site that NPS would attempt to enhance through interpretation and vegetation removal. Resources, such as these artillery grounds and marked battle locations, that contribute to the significance of the park's battle and commemorative landscapes would be preserved, restored, or rehabilitated. As part of this effort, it is NPS' goal to remove and relocate the major visitor services facilities from their present locations, within and immediately adjacent to the Major Battle Action Area of the battlefield. Removal from these sites, where they adversely impact critically important historic landscapes, to a less significant part of the battlefield would enable NPS to rehabilitate resources and landscape features that materially affected the outcome of the battle. The topography that made the Union center significant, and which was observed by both Union and Confederate officers and soldiers, would be more readily observable to the park's visitors. Lands that were crucial to the outcome of the battle—such as the Union center—and that were highly contested over three days of the battle would be rehabilitated as a memorial to the soldiers who fought, bled, and died there. Lands that were less crucial would also be assessed to preserve essential battlegrounds. Every effort would be made during siting and construction of the proposed new facility to protect all contributing and significant historic or archeological resources, including historic views and fields of fire that affected the progress of the battle.

## COMMENTS

## RESPONSES

*power*, and *understanding* to truly realize and prevent what is currently happening to these fields of glory. All eyes of the past, present, and future are upon you now to help this losing battle *become* a winning battle! Unfortunately, there will always be those individuals who do not care about commercializations such as the fast-food, gas-stations, and restaurants but desire a paved and commercialized and tourist "version" of seeing where honor, glory, and brotherhood was borne from those fields. Please, do not do this development for your own glory. If there is no-one from this honorless era to persuade you and the many others, than at least listen to one man who does realize and understand the significance and the need for these hallowed battlefields:

*"What has gone takes something with it, and when this is of the dear, nothing can fill the place. All the changes touched the borders of sorrows."*

*-Joshua L. Chamberlain, (Oct. 3, 1889).*

Respectfully,

Aaron E. Dunn

Dear Dr. Latschar,

DEAR SIR, I WRITE to you again to express my VERY dissapointing REACTIONS towards the building IN the park's boundaries. What does For once, need to MOVE "FORWARD" is a plan/ museum that is OFF AND AWAY the park's historic Boundaries!!

Sincerely,

Name AARON E. DUNN

Address

## Aaron E. Dunn

## COMMENTS

Author: Robert Dunn at NP--INTERNET
Date: 10/19/98 3:20 PM
TO: GETT Public Affairs Office at NP-GSTT
Subject: Draft GMP
---------- Message Contents

Although the comment period expired over the weekend, I would like, if possible, to submit some brief comments in support of the conclusions and recommendations made by the NPS in the draft GMP. As a member of the FNPG, I have already submitted comments which I understand will be part of the record.

First, contrary to some of the assertions which have been afoot, the public has had more than ample opportunity to participate in the drafting of the plan. As a former state official in New Hampshire, I have seen few_ undertakings which have been subject to the level of public involvement as has the GMP. Public scrutiny and participation is something which we pride ourselves on in this state, and thus we are particularly attuned to governmental projects which seem to be done in secret or without regard to the views of affected constituencies. The GMP does not suffer from those defects. The issue of_ alleged deficiencies in the opportunity for public comment should not become a red herring which deters the NPS from effectuating the GMP.

____ Second, while the impact of the proposed changes undoubtedly affects most readily the people of Adams County, it should not be forgotten that the GNMP is a resource for the people of the whole country. Many like myself travel large distances to visit the park at least once or twice a year. Thus, I_ was particularly pleased to see that the GMP contemplated improvements in the park archives. I encourage further work in that area so that an index_ ( and eventually the archives themselves) can be made available online.

___ Third, assuming that the Kinsley proposal is put into operation, it is absolutely critical that the proper precautions be taken to protect the land along the Baltimore Pike, especially near Hunt Ave. Under no circumstances can that area be allowed to become another Steinwehr Ave. once the new Visitor Center is complete.

____ Fourth, the rehabilitation of the battlefield to its 1863 appearance is one of the most important sections of the plan._ The environmental impact, as laid out in the plan, is minimal. Even assuming that the impact were much greater, however, the NPS still should not be deterred from carrying out the alterations. As the plan makes clear, and as common sense would dictate, the GNMP is first and foremost not a wildlife sanctuary or recreational area, but a historical site.

___ Finally, I would like to commend the NPS on its work in developing this draft, and thank the public affairs office for the speed with which a copy of the draft was provided to me. Best of luck in your ongoing work.

_____ Robert E. Dunn, Jr.

## RESPONSES

**Robert E. Dunn, Jr.**

## Michael D. Dyas

8 October 1998

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Rd.
Gettysburg, Penna. 17325

Dear Dr. Latschar:

I appreciate recently being provided a copy of your August 1998 Draft General Management Plan and Environmental Impact Statement. I found many interesting insights in this document, and salute you on the extensive research and study which obviously went into its development. I wish that I was able to comment in some detail on numerous items of concern in the draft GMP, but will have to limit my input here.

Overall, sir, I feel that Alternatives B, C and D all would represent important steps in the right direction; compared with the status quo, or Alternative A. In principle, I'm inclined to favor Alternative D, or maximum restoration and rehabilitation of the Park to represent its 1863 appearance. I can appreciate, however, the practical, fiscal and political complications which would make implementation of this approach difficult. I suppose, then, that your recommended Alternative C may be the most realistic concept for the near future.

I've been following developments concerning the proposed partnership between GNMP and a private foundation in planned new visitors facilities at Gettysburg. Bearing in mind long-standing controversies regarding for-profit concessionaire operations at various National Parks, I continue to have reservations about the proposal for GNMP. I'd much prefer that the U. S. Congress provide full funding for necessary facilities at National Parks; or, in combination with appropriate "user fees," to the degree which they can be practically assessed.

Given current political realities, though, the sort of private - public venture envisioned at Gettysburg may be the best which can be hoped for at this time. If I understand correctly, the joint venture concept has been endorsed -- with some misgivings -- by the National Parks and Conservation Association. I support that advocacy organization, and generally concur with its positions. I've favorably noted the scaling back of the original foundation proposal, to eliminate several more questionable or commercialized aspects; including the IMAX theater and gift shops. (Not incidentally, I'll mention having read with interest the related report which appeared in the Oct. 2nd Washington Post; as well as that newspaper's editorial the following day.)

Sir, I support your stated intention to phase out public activities at GNMP which clearly are inconsistent with the Park's primary purposes or missions (as discussed on pp. 7 - 9 of the draft GMP); and/or which may cause unacceptable resource damage. Specifically, I don't perceive recreation as being among the reasons why the Gettysburg battlefield and other historic sites were set aside for management by the National Park Service.

(cont'd)

# COMMENTS

-2-

I noted (p. 67) that, if the no-change alternative A is adapted, such events as bicycle races and "dog-a-thons" could continue at GNMP. (I'm not sure just what the latter activity is; but it certainly doesn't sound like something at all appropriate at the battlefield.) Although I'd be concerned that there would be some adverse reaction from some area residents and politicians, I feel strongly that all recreational activities at GNMP should be phased out as quickly as possible.

I wasn't surprised, sir, to see that traffic management issues are a major part of the draft GMP. This is too complex an area for me to discuss here in any detail. Ultimately, however, I'd prefer to see private automobile access phased out at Gettysburg, so far as practical. (That obviously would except the major highways which cross the Park, insofar as it's generally accepted that they are to remain.) Rather, I'd like to see a comprehensive shuttle bus or van service implemented at Gettysburg, to dramatically reduce reliance on private vehicles, and the numerous problems which they cause.

Per my brief comments to you a year or so ago, I have continuing concerns about policies at GNMP effecting bicycling. I should begin by emphasizing that I'm a long-time cyclist, if primarily of the "road" or touring variety.

It's my understanding, sir, that you intend to continue restricting bicycle traffic at GNMP to hard-surfaced thoroughfares. I definitely endorse that policy. I do believe that bicyling in the Park should be encouraged -- consistent with state traffic laws -- as an alternative to reliance on automobiles. Besides observing applicable vehicular regulations, I feel that cyclists at Gettysburg should be expected to wear appropriate helmets. Ideally, I think that this should be mandatory; although I recognize the practical difficulties in compliance/enforcement.

At the same time, I'd very strongly object to <u>any</u> off-road cycling at GNMP. It's my understanding that you've been under pressure to open the Park to "mountain" type or all-terrain bicycles. I believe that this would clearly be inconsistent with the Park's mission statement, as well as a serious threat to fragile resources. It's my reading of the draft GMP that none of the alternatives would make provision for off-road cycling. If that's correct, I fully support that decision.

Sir, I perform extensive volunteer trail maintenance work for the National Park Service (primarily at Shenandoah National Park). So, I reviewed with particular interest portions of the draft GMP which discuss issues related to trails and pathways.

I definitely support your intention to remove current "non-historic" trails from GNMP, including the existing cross-country equestrian routes and the nature trail. I fully agree that the Park shouldn't provide trails primarily for recreational or fitness purposes. . . At the same time, it's my understanding that you'll maintain appropriate walkways -- including the various historic farm lanes -- to facilitate access on foot to historic sites, monuments, and so forth.

Frequently moving the moved rights-of-way across more-or-less open portions of the battlefield seems to be a generally workable approach. Otherwise, I believe that many pathways need to be "hardened" in some way (not necessarily blacktopped), to minimize soil erosion/compaction, loss of vegetation, etc. Likewise, I believe that walkways must be designed so as to encourage people to <u>stay on</u> the hardened surface. From my considerable experience in trail work, I well recognize how difficult that can be, even in heavily wooded, indeed rocky, terrain. I wish that I could offer some workable technical recommendations in this area.

(cont'd)

# RESPONSES

-3-

Sir, I have some serious concerns about horseback riding at GNMP. I'll preface that by stating that I'm not against all equestrian activities in National Parks. For instance, I have no problem with some trails and fire roads in Shenandoah National Park being open to horse traffic. . .At the same time, bearing in mind your mission statement, my views on horses on the Gettysburg battlefield are basically the same as regarding off-road cycling. (Not incidentally, I'm quite sure, sir, that you're familiar with longstanding controversies regarding recreational equestrian activities at Manassas National Battlefield Park -- not the sort of thing which I'd want to see at Gettysburg, or other historical units of our National Parks system.)

I certainly agree, sir, that horse traffic at Gettysburg has caused unacceptably severe erosion on some of the most significant portions of the battlefield. I see no way to satisfactorily mitigate this problem, except to ban horses. However, if I interpret correctly, you anticipate that horses will continue to be permitted on the Park's hard-surfaced commemorative avenues, as well as the farm lanes dating back to the Civil War era. Even if erosion shouldn't be such a concern on these more-or-less hardened thoroughfares, sanitation certainly would be. My recommendation, then, is that all horse traffic be phased out.

a

Your intended removal of existing horse routes -- in particular, across the "Pickett's Charge" area -- would seem to be tantamount to ending, or at least sharply curtailing, the horseback battlefield tours which have been provided by concessionaires. I strongly endorse that conclusion, although I'd be concerned about adverse local political reactions. I suppose that the argument could be made that, because the 1863 armies made extensive use of horses, then equestrian tours of the battlefield therefore are appropriate. I'd have to disagree, considering the very serious environmental problems presently caused by horse traffic.

* * *

Again, sir, I wish that I was able to comment here on quite a few other aspects of the draft GMP; but, this will have to do. Thank you, then, for considering my views. I'll look forward to receiving updates on the final development and implementation of the blueprint.

Respectfully,

Michael D. Dyas

MICHAEL D. DYAS

cc:
National Parks & Conservation Association (attn: "Park Watch")

a The draft GMP/EIS proposes the removal of existing non-historic horse trails from Major Battle Action Resource Areas where they are eroding and causing severe resource damage, and the relocation of trails to existing and rehabilitated historic farm lanes that would provide a solid base that would be less prone to erosion. The draft GMP/EIS does not recommended that horses be allowed to use paved commemorative avenues as part of the trail system. However, in some cases, it may be necessary for horse trails to cross avenues. Properly sited and managed horse trials would provide a safe and enjoyable visitor experience for all.

## COMMENTS

Dear Dr. Latschar,

It is imperative that the General Management Plan for the new Gettysburg Visitor Center move forward. Approval is vital to properly care for the currently decaying irreplaceable artifacts, as well as the Cyclorama painting.

Sincerely,

Name Mrs. Tudor M. Ellis

Address

## RESPONSES

**Mrs. Tudor M. Ellis**

**William Tudor Ellis**

8/22/98

Dr. John Latschar, Superintendent

I agree with the FNPG Board that NPS negotiations are moving in a positive and productive direction in regards to the Gettysburg National Battlefield Museum Foundation.

Please put this project on the "Fast Track" so the GNMP's archives, collections and Cyclorama painting can be housed properly.

I began submitting my comments on this project prior to joining FRIENDS. I want to thank you for providing a private citizen with updating correspondence.

I also appreciate the Draft GMP I received. A lot of government publications put the ordinary citizen asleep in a matter of minutes. I find the "Draft" not only informative, but interesting reading.

Thank you for your time,

Sincerely

William Tudor Ellis

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>It's important that the General Management plan move forward. We appreciate the opportunity to be heard.<br>Thank You<br>Sincerely,<br>Name William S. Eptic<br>Address | **William S. Eptic** |

Author: EVEREW at NP--INTERNET
Date: 10/1/98 7:11 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg
---------- Message Contents ----

Gettysburg must be preserved. The park must be maintained for future generations. It is a vital part of our history.

EVEREW@aol.com

## COMMENTS

Author: at NP--INTERNET
Date: 11/18/98 4:20 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Dear Sir
---------- Message Contents

Dear sir:

a It is my opinion that we should not allow the whole plan to make a visitors center take place. I feel that we should build a new visitors center, but should not allow a cafeteria. This will just ruin the hollowed ground in which men gave their "last full measure of devotion". I'd also like to share with you that I am interested in a career with the National Park Service and am curios as to what type of degree you need to run a park. If you could respond I would be very thankful. I would also like to add that one of the parks rangers, Tom Holbrook. He has such a respect for the men who died at Gettysburg.

Sincerely,
Michael Fay

## RESPONSES

### Michael Fay

a NPS evaluated the impact of the cafeteria-style restaurant in the proposed museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

Bruce Babbitt, Secretary
Dept. of the Interior
1849 C St. N.W.
Washington, D. C. 20240

1 October 1998

Dear: Secretary Babbitt

I am writing as a concerned American, a member of the Peninsula Civil War Round Table, and a constituent. (PCWRT meets 3rd Tuesdays, Salvatore's, San Carlos ; come at 11:15)

In general, I am writing about my concern for priority of order by Congress. There seems to be an almost unlimited source of funds for foreign aid, etc. Specifically, I would like to see a more favorable concern for the preservation of Civil War historical sites. Numerous Civil War battlefields are being replaced by highways, mall, etc, every year. There are a large number of "grass roots" organizations that would support your efforts in the direction of preservation of Civil War historical sites.

a Additionally, I (along with many others ) am opposed to the funding ($ 74,000,000) to commercialize the Gettysburg National Military Park . The funds would serve a much better purpose if utilized to preserve endangered sites. The requests to extend the " comment period " on the General Management Plan for modifications to the GNMP seem to be totally in the hands of Supt. John A. Latchar, who seems to be oriented in the direction of self-gratification.

It is my understanding that David Barna, NPS, stated that any decision to extend this evaluation period would be the sole discretion of Supt. Latschar and not by anyone in Washington. This appears to be a blatant disregard for the public and a classic example of "putting the fox in charge of the henhouse."

Your consideration and cooperation would be greatly appreciated .

Sincerely,

David Feild

cc: Mr Jerry Russell , Heritagepac
Mr. Ruff Fant, The Civil War Trust
Mr. Steve Sylvia, NST Civil War

## David Feild

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

Dear Dr. Latschar,

As a member of Friends of Gettysburg — I feel it is important that the plans move forward regarding the General Management Plan for Gettysburg

Thank you for your consideration

Sincerely, Linda E. Feltman

Name Ms. Linda Feltman

Address

## RESPONSES

**Linda Feltman**

Tuesday, October 06, 1998

**TO:** Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

**FROM:** James Ferguson, Jr.

**SUBJECT:** Comments on the Draft General Management Plan and Environmental Impact Statement, Gettysburg National Military Park, dated August 1998 (Reference D18)

INTRODUCTION:

In the 135 years since that fateful battle, in the fields of Gettysburg, our Country has changed dramatically. We have come from the horse-and-buggy days to a period where technology growth has made things possible that just a short generation ago would have seemed unimaginable. These types of changes will continue at an ever-increasing rate. Paradigm shifts will take place that will result in step changes in capabilities that in many cases cannot even be envisioned currently. Only the most forward thinking individuals, groups, agencies or companies will be able to foresee the changes that are bound to take place. Nevertheless, take place they will. Anything we can do to recognize and contend with those changes will benefit us in our planning and subsequent implementation and ultimate realization for this project.

PERSPECTIVE:

The following recommendations and comments will not be about the history of the event nor, for the most part, the specific plans that are being recommended. I will state however, outside of my recommendations, that Alternate C or D, would, in my opinion, be much more preferable than Alternate B and certainly Alternate A.

RECOMMENDATIONS:

The current Draft General Management Plan and Environmental Impact Statement, dated August 1998, should be revised to include or consider the following:

a 1. A Vision Statement for the Park should be included.

## James Ferguson, Jr.

a Director's Order 2, the NPS policy document that discusses planning, suggests that GMPs should describe what resource conditions and visitor experiences a park should have. This plan incorporates alternatives that describe different futures for the park's resources and visitor experiences. The combination of these two factors constitutes the vision for the park.

## COMMENTS

b 2. The Various Management Prescriptions should be revised to include measurable and substantial, time dependent guidelines for remediation, preservation and subsequent interpretation of park resources.

c 3. Some possible methods of developing a revenue stream, to enable the operation of the park to ultimately become self-supporting, should be investigated and proposed.

4. The proposed new Visitor Center and Museum should be developed by a new Congressionally constituted foundation and not in partnership with a 501(c)(3) type consortium. It would, by direction, recognize the importance of making and keeping the physical area "as it was" and yet provide a modern, state of the art and without peer, venue. Furthermore, the management of that facility should be the responsibility of that entity.

5. Finally, the plan, management and environmental impact should not be just for the next 15 to 20 years. It should be for the next 15 to 20 generations.

DISCUSSION:

Why a Vision Statement is Needed

"The mission of Gettysburg National Military Park is to preserve and protect the resources associated with the Battle of Gettysburg and the Soldiers' National Cemetery, and to provide understanding of the events that occurred here, within the context of American history"

The GNMP Mission Statement provides contemporaneous comment about preservation, commemoration and education activities expected to be undertaken for the benefit of the American people. Missing is a sense that suggests that these goals are expected to be fulfilled for future generations.

A vision statement is designed to provide a view of what the ultimate goal is. The impression or concept that you strive to attain in terms that may be more of the imagination than a mission statement. The vision needs to be attainable ultimately as much as the mission needs to be doable. However, the essential difference between the two is that the vision clearly requires continuous future effort where the mission goals are concomitant.
The prescription or rule or in fact the strategy to achieve the goals is an action plan for present day.

It may be that the lack of future required achievement that allows the generation of a GMP with limited real life. If no consideration need be given to satisfying future plans then why do it. On the other hand, maybe it was



## RESPONSES

b Director's Order 2, the NPS policy document that discusses planning, explains that GMPs with management prescriptions set the framework for the more specific planning you suggest. The level of detail you suggest can be found in the Government Performance and Results Act planning NPS is required to complete. These plans include measurable goals, based upon the general framework set out in GMPs. This is described on pages 2 and 26 of the draft GMP/EIS.

c The proposed partnership for the visitor center/museum complex is designed so that the NPS would not have to pay for the costs of operating or maintaining the complex. This, in turn, would make scarce NPS dollars available for other resource preservation and interpretive priorities.

recognized that a vision was of value but it was determined that one could not or would not be forthcoming for some reason. One could guess at possible scenarios ad infinitum without benefiting the process.

In addition, in my opinion, a vision would help to force a GMP useful management life out beyond the 15 to 20 year period. In fact, what determined the present period. Very generally speaking, the inadequacy of the previous plan determined its useful life.

Why Should Management Prescriptions be Revised to Include Timelines

The appropriate Management Prescriptions should be revised to include measurable and substantial, time dependent guidelines for remediation, preservation and subsequent interpretation of park resources.

The time horizon should be stated. It should be clear that this new plan is being developed to provide a guide for operations for a substantially longer period of time than the 1982 plan. Although management prescriptions are not detailed development plans, an overall time horizon should be made visible for those who develop the various range of actions. Perhaps if longer periods were being considered, actions felt appropriate for five-year plans might not be the best course of action.

My comments are directed towards developing a plan and course of action for this National Battlefield, that is to many, and perhaps should and will become to most, the centerpoint of our National consciousness of the Civil War. It should recognize the technology that is upon us, and try to identify the growth that will take place, not just for the next 15 to 20 years, but for the next 15 to 20 generations. It should consider that memorials are forever and a management plan that only looks forward to the foreseeable future is doomed to produce rounds and rounds of reviews, potential political manipulation for the obvious purpose and further revisionist redefinition of commercial encroachment each time renewal is required.

Said a different way, the longer the new plan is designed to adequately cover the things we know will probably occur, based on current and past experience and hopefully some visionary inferences, the more likely the Park will improve and the environs, if planned properly, can be buffered.

Why Should the Park be Self Supporting

The Gettysburg National Military Park is but one of 9 National Military Parks or 24 National Battlefields under the currently proposed designation, within an NPS system of 376 designated sites. Although Gettysburg may be the centerpiece of the Civil War to some, it is probably true that the majority of people find it to be just one of many significant areas within the context of our history.

## COMMENTS

Therein lies the problem. The current economic situation is as good as it has been for many years. Yet, even under these conditions the NPS budget shortfall for the current fiscal year has been published as being well over $5 Billion. A sum actually several times the current budget. GNMP will vie with the other 375 sites within the system to garner its fair budget share. Of course, there will be shade resulting from this budget money tree and to be sure, some sites will be better politically connected than others will. However, the amount of money that a site gets could ebb and flow from year to year because of congressional process vagaries that we probably cannot even imagine currently.

The existing operations and maintenance costs for the park are approximately $4.6 million. This supports 75 Full Time Equivalents. Even the most ambitious alternative, plan D, adds only 29 additional FTE's. Maintaining a stable dedicated cadre of people in spite of variations in total park budget could probably go a very long way in maintaining park eminence. Dedicated people have a way of accomplishing the almost impossible tasks that need to be done in times of reduced financial support. "We do what we must, and call it by the best of names" wrote Ralph Waldo Emerson.

So it seems that for a additional revenue stream of approximately $2 million in today's terms we would help ensure a professional staff who, knowing that, with reasonable certainty, there would be stable employment, in these continuously downsizing times, be able to concentrate on their delightful tasks.

With out going into a lot of "what if" scenarios, this does not seem like a very daunting task and certainly could be accomplished in many ways.

This leads us to the next recommendation.

Why a Congressionally Constituted Foundation

Although on the surface, a public private business relationship seems reasonable, it makes me uncomfortable for several reasons.

With all due respect to the many people who responded to the Draft Development Concept Plan/Environmental Assessment (DCP), it seems to me that some of the major conclusions that were reached were not correct. Rather than promoting a concept within a concern, they produced a conclusion based on their ability, or inability as it were, at the time to speak to the concern. This is a reason why "visions" are important. Let us take the IMAX Theater as a case in point. The major concern was the size of the structure that would house the IMAX facility. It was felt that the facility would have to intrude on the viewfield because of its size. The fallacy of coming to those kinds of conclusions and destroying a perfectly good concept became evident almost immediately. IMAX announced that a 3/4th or 2/3rd size facility is being considered for future applications. But

## RESPONSES

even that is probably not needed if the idea, or concept, that the viewfield was inviolate was foremost, then perhaps below grade construction would have been more fully considered. (We need to also consider expected expansion requirements.)

The private side of the partnership, even though it would be part of a 501(c)(3) venture (with NPS Board Members and appropriately approved Articles of Association), would ultimately flounder if the commercial enterprises within the Visitor Center and Museum did not at least cover expenses. In addition, suppose the private company goes out of business. Then what happens legally to the partnership agreement? Even very large corporations are subject to dramatic changes in corporate structure as business conditions change. Many corporate names once household or at least business words are no longer in existence.

Therefore, the people that claim that eventually there could be a government bailout may have a point. History suggests that on whole, only a relatively few companies persist through changes in management across generations.

Why Plan for such an Extended period

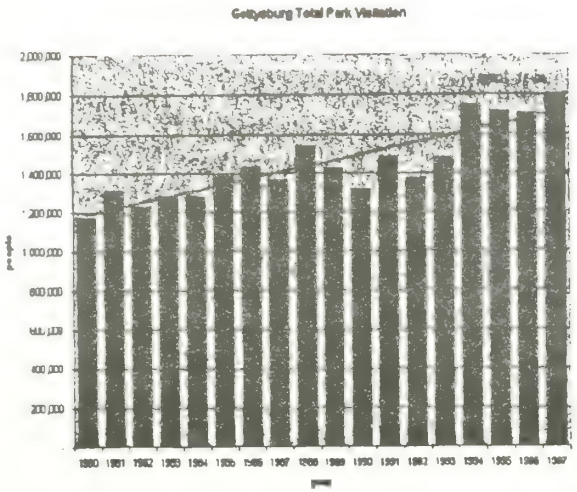
Quite simply put, because the Park and it's facilities should be expected to endure as long as our other National Monuments and National Memorials are designed to last. I do not think it is too much to expect that a scheme that is developed to help ensure that the programmatic aspect of the GMP for such a national treasure be envisioned to last generations not just a generation or so.

Presenting a new GMP based on the same or similar ground rules and expected implementation period, that was used previously, seems to me to be a prescription for sure failure. Using the methods that produced a plan that early on became obviously inadequate and expecting it to produce some other result is very troubling.

This failure will be recognized by the observing the events that occur in the period after the institution of the new GMP, as it's presently constituted. As happened with the GMP put into effect in 1982, facility shortcomings will become obvious in a short time. Inadequacies in facilities, will be most notable and most troubling. Although trying to extend the useful life will certainly make the initial task more difficult, I would guess that most people if asked would say it was worth it.

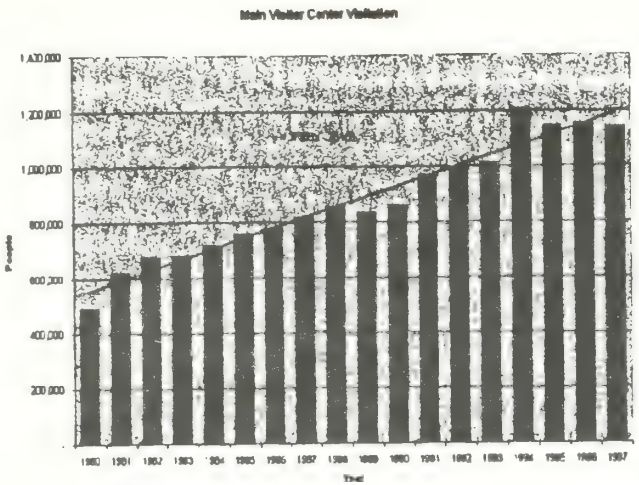
# COMMENTS

# RESPONSES




The above chart is derived from data in Table 21 of the GMP. The simple linear trend line has been added to facilitate projecting, in the out years, what future park visitation might occur. Obviously as depicted from the current data, some years may exhibit increased or decreased visitation but the trend suggests that almost 31,000 more people each year could visit the park. In other words, an increase in visitation of up to a quarter of a million people per year could happen in as little as an 8-year period.

Of course, as pointed out in Chapter 3 of the GMP, many things can affect the number of visitors and the distribution of their visits. However, one would expect that if the park is remedied to the extent of at least Alternative C then the already very high percentage of people that rate their experience good or very good would increase and total park visitation could increase at an even faster rate.




Couple this with the even faster rate of increase in visitation that is occurring at the main visitor center (Table 22 in the GMP) as shown above. It then becomes obvious that a GMP and impact Plan must consider that major expansion in facilities will be required in just a few years if the new accommodations are even appropriately sized at the beginning.

Another aspect of Park popularity should also be considered. This aspect is generally most troubling to the people whose interests or avocation or vocation lie in the area of U.S. history. Especially bothered are those who concentrate on just the Battle of Gettysburg. Many would like to see the Park and surroundings exactly as they were in 1863. Without going into all the possible ramifications of what that means, it probably would be impossible to accomplish. The cognoscenti would still want it as close as possible and perhaps that is not bad. However, the average person would most likely not appreciate that level of "correctness" and I suspect also, it could adversely affect their experience at the Park.

It seems to me that between the boundaries of good taste and historical correctness lies the possibility of making the average visitors experience at the Park as memorable as could be achieved at any National venue. Would not it be wonderful if schoolchildren and adults alike came away with an inspired feeling? A feeling that could result from being immersed in the period by all the available technical, physical and educational means. The use of state of the art facilities and presentations, it seems to me, would help substantially in producing that effect. The most modern methods possible should be used to present the

message of Gettysburg. If this requires processes that perhaps are not what some might consider enough representative of the past period or too modern to convey the "real" meaning of the of the Battle then so be it. I suspect this will be a quite small group of purists. But, to not do it, it seems to me, will ultimately result in exsiccation of interest in these areas for many more people who otherwise would be encouraged and stimulated to learn by the method of presenting the message as much as the message.

I have not touched at all on the commercial business aspects of the GMP outside the Park. That to me seems like a situation that will, because of the evolutionary nature of what will take place, take care of itself. The entrepreneurial spirit will, in spite of protestations to the contrary, take care of the perceived loss of business naturally.

Closing:

I would like to complement Dr. John A. Latschar and the Staff of the Gettysburg National Military Park for the highly professional way in which the GMP/EIS is constituted and presented. My recommendations are in no way meant to reflect negatively on a job very well done.

Sincerely,

James Ferguson, Jr.

## Barbara J. Finfrock

BARBARA J. FINFROCK

7 September 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

Having received a copy of the *Draft* General Management Plan and Environmental Impact Statement for the Gettysburg National Military Park, I wish to express to you the value of this document. I believe it puts forward some excellent options for the perpetuation of the important part of our American heritage here in Gettysburg. I feel privileged to be able to attend all the public meetings the Park has held over the past few years - the staff there should be commended.

I have already reviewed the entire document, making comparisons between the various options. The 60-day review and comment period is most generous.

I believe the National Park Service negotiations are moving in a very positive and productive direction, and I have written to both Senator Thomas and Congressman Hansen to urge them to lend their full support to this partnership project and help to ensure that it moves forward as swiftly as possible

Thank you for the opportunity to participate in something which I believe to be of great significance to our country and its heritage.

Sincerely,

Barbara J. Finfrock

Barbara J. Finfrock

## COMMENTS

**Dear Dr. Latschar,**

Thanks a lot for all the effort you + your staff have given to the GMP – it is wonderful to be able to be a part of this process. Those who are negative are obviously self serving, so hang in there !!

Sincerely,

Name Barbara J. Finfrock

Address

## RESPONSES

**Barbara J. Finfrock**

Floyd & Graff CHIROPRACTIC HEALTH CENTER

August 24, 1998

Dr John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Rd.
Gettysburg, PA 17325

re: Gettysburg Visitor's Center proposal

Dear Dr. Latschar,

I have been following the proposals and proposal changes for the Visitor's Center at Gettysburg National Military Park. It seems that the negotiations are moving in the right direction, and I urge your support for this proposal.

I recently fulfilled a lifelong dream by spending 8 days studying the battlefield with Guides and Rangers. The Visitor's Center is crowded and the facility cannot handle the numbers coming to visit.

Gettysburg is a priceless cultural heritage, and every effort to preserve this "hollowed ground" is welcomed. This project should move forward as swiftly as possible to protect the area and deteriorating historical artifacts and the Cyclorama.

I thank you for your efforts and support.

Sincerely,

Steven A. Floyd DC

Steven A. Floyd, D.C. David A. Graff, D.C.

## Steven A. Floyd

## COMMENTS

Forward Header

Subject: The proposed privatization at Gettysburg
Author: RogerF
Date: 9/24/98 12:25 PM

Hello -- Please excuse me if yours is the incorrect department. I've been searching the NPS website for some time, and I'm trying here.

An article in this morning's Harrisburg Patriot says that the service is gathering public comment about the proposed private development of a new park center. While it is easy to complain about almost anything that is new or unfamiliar, I must say that the idea of privatizing the park's center seems poor to me.

a) Surely the government can afford to upgrade facilities.

a b) Privatization often leads to decreased responsiveness whenever an issue unrelated to profit must be decided for the common good.

c) Of course, access to the park is certainly an issue. It is best solved by the sort of education and information that the park service has provided for many years. We don't need a privatized park, and a commercialized entrance will set a tone better left to Disney World. We do need a stronger, better funded Park Service, and I am badgering my various elected officials about that point.

Many thanks for reading this note and for forwarding it to the proper audience.
Roger H. Ford

## RESPONSES

### Roger H. Ford

a The description of the proposed partnership in the draft GMP/EIS (pp. 97-99), and the Letter of Intent between the NPS and the Gettysburg National Battlefield Museum Foundation (pp. 326-39), state that all programs and operations within the new museum complex would be conducted either directly by the NPS or by one of its partners. All partnership programs and operations would be subject to the review, approval, and oversight of the NPS.

Dear Park Superintendent:

a Please do all that is necessary to ensure that the historical grounds of the Battlefield at Gettysburg are preserved without additional commercialization or private-business construction, for any reason.

The site is one of the most important in our country's history, and it would be morally incorrect, in my opinion, to allow the area to be tainted in this way. When people, who appreciate the serious nature of that conflict, visit the site and find themselves overwhelmed in the many layers of turmoil represented by that battle, they should be allowed the opportunity to consider their feelings without intrusion, visual or auditory, from nearby less honorable undertakings.

Please, please don't allow this site to be cheapened.

Thank you.

John Frawley

## John Frawley

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

| COMMENTS | RESPONSES |
| --- | --- |
| Sophia P. Friedman | **Sophia P. Friedman** |

Sophia P. Friedman

Dr. Latschar, Supt.:
Gettysburg National Military Park.

If the money is available, make the park the best that it can be — the most complete of the four options without commercialism. Leaving projects for the future always proves to be more costly.

Although the park is a memorial for the men who gave their lives and for an event in history that shaped our country, it also reminds us of our frailties as individuals and as a nation.

Sophia P. Friedman

D. Friend

16 October 1998

Dr. John Latcher, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa. 17325

Dr. Latcher:

I am writing this letter to let you know that I have studied GNMP General Draft Management Plan. I believe that Alternative C is the best option for the future of the Park and I endorse it fully except for one minor exception.

a I personally believe that the old style pipe fencing would be intrusive everywhere on the battlefield except as a boundary marker. There still is some of this type of fencing along Rock Creek/Culp's Hill area. I do think pipe fencing would make an excellent boundary marker. The current boundary signs do not adequately protect the current Park boundary. As I said this is a minor point.

I would also like to suggest that the proposed restoration of the landscape be done gradually as to minimize the impact on the environment.

It saddens me that a few local business men want to hold up this project because they are worried about their "piece of the pie". It is a shame that they do not have the vision to see that this is not just a local concern but a national trust that needs to be protected. I admire you greatly for being able to put up with their vitriol and doing it with grace and class.

Sincerely,

David O. Friend



## David O. Friend

a The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new, modern design element into the Battlefield Commemorative Resource Area of the park.

The reintroduction of pipe-rail fencing along some of the park's avenues should not deter visitor views. Although opinions vary about the aesthetics of various aspects of the both the commemorative design and the vernacular battlefield landscape, the pipe-rail fencing was nonetheless part of the original design effort that transformed portions of the battlefield into formal park environs. The fencing enclosed and set off the formal lawn, monuments, cannon, and avenues and was one of those "artistic and patriotic effects" envisioned by General Daniel Sickles in 1894. As one of the features that was to give "added glory and significance" to the Gettysburg battlefield, the pipe-rail fencing was an integral and early part of the park's design effort. Although today's visitors often demand immediate access to all parts of the battlefield, NPS considers that the reintroduction of avenue fencing would not unnecessarily impede respectful use of and access to the battlefield.

## COMMENTS

Dear Dr. Latschar,

It's important that the General Management plan for Gettysburg Visitor Center / Museum Complex move forward. Please support the project & help make it a reality

Sincerely,

Name KATHY FRONHEISER

Address

## RESPONSES

Kathy Fronheiser

## Robert E. Fullerton

01 October 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Hi;

After carefully digesting the Draft General Management and Environmental Impact Statement I have come to the conclusion that Alternative D would best enhance the visitor experience, preserve the national heritage of the park while protecting the environment.

Sincerely,

Robert E Fullerton

## COMMENTS

October 12, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar,

This last weekend while in Gettysburg , Ranger Eric Campbell provided me the information necessary for me to obtain a copy of the General Management Plan (GMP) for the park. Having just received this information and doing my best to understand the basic plans being offered for consideration, I wish to express some of my thoughts. First however, for the last seven years I have visited Gettysburg in April and October each year as I am a student of the battle. Also, as a member of the "Friends of the National Park at Gettysburg" I am well aware of the conversations taking place within the park in regards to a new visitor center. The idea of a new visitor center is exciting and I fully support the need to proceed with this plan. Your working with the "Friends" in this regard is very much appreciated.

Having just received the GMP I have spent but limited time in reviewing the various plans. Please allow me to comment to the areas that I see as important.

a. *Section 2.7.3 Visitor Use and Facilities*

*Page 95 please see "Range of management plans that would result from this prescription include:*
*"Close of internal park avenues, like Hancock, Stone and Meridith, at some times of the year, to allow pedestrian use of these avenues and/ or repair of historic fabric".*

*Page 96 "Although some avenues may be closed to general automobile and bus traffic, they would remain open to vehicles using a Licensed Battlefield Guide or to ranger-led tours".*

a If I understand these statements correctly, this part of the plan if incorporated, would prohibit the normal visitor like myself, from having free access to all the avenues and roads within the park as we do today. I would be required to use park provided public transportation or Ranger or Battlefield Guided tours. This is completely and totally unacceptable. Today as I visit the park I drive within all areas of the park. As I research the various units that fought at Gettysburg and follow their movements I am required to drive to many areas of the field. An example of this is the Iron Brigade. This fine Midwestern unit was hotly engaged on the 1st day. They were forced from their position and fell back through town. The Iron Brigade would eventually occupy a position along the western slope of Culp's Hill. If I were required to use park provided transportation I would loose very valuable time in waiting or re-boarding transportation means. As I am limited to only about three days per visit the time I spend on the field is very valuable. If as this last weekend, as I was researching the 68th Pennsylvania Infantry near the Peach Orchard it began to rain. Will the park provide visitors such as myself shelters for

## RESPONSES

### Tim Fulmer

a In order to provide access to all points of the battlefield to visitors, the draft GMP/EIS does suggest limited and seasonal restrictions on vehicular traffic on certain avenues. However, those restrictions would only be imposed when heavy traffic congestion and potential gridlock at popular places on the battlefield threatens to make visitor access difficult or impossible. When that occurs, the draft GMP/EIS suggests that alternate transportation would be available to ensure that visitors could access all points of the battlefield. Visitors would not be required to use a licensed battlefield guide.

protection from the rain? In my case I simply went to my car and waited for the rain to subside. This free access to the park is one of the great benefits to students of the battle such as myself. Being forced to board park controlled transportation to be shuttled around the park is not in the best interest of everyone that visits this historic and magnificent park. The veterans themselves designed this park for close and personal viewing of the monuments they so proudly erected.

I as I mentioned, have not had a great deal of time to study these proposals and perhaps I have missed something. But to deny direct, personal access to the battlefield will meet much opposition from regular visitors to the park. My visit last weekend was as usual a wonderful experience. Instead of my family, this time I brought three friends that share my interest in the Civil War and this battle but that have never visited Gettysburg. They were amazed and thrilled on how great and well preserved this field was. They enjoyed our rides through the park reviewing the many monuments and seeing all aspects of the battle and the locations where the events they had read about happened. This personal, leisurely access to the battlefield must remain as it is.

The battlefield looks better to me this year than it has in years past. Your leadership and concerns about the park are appreciated by me. But keep in mind that Gettysburg is to be my future home. What happens to this wonderful park is very much my concern.

Sincerely,

Tim Fulmer

## COMMENTS

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

a [illegible]

[illegible]

b [illegible]

[illegible]

Very truly yours,

John M. Fuss

John M. Fuss

## RESPONSES

### John M. Fuss

a The cost estimates for tree removal are high because of the care NPS would take to minimize the impacts to the park resources and the environment. The park would use best management practices and would phase large projects in order to reduce the effects of cutting. In addition, the type and quantity of trees to be cut has yet to be determined. Therefore, no value for those trees can be estimated. Consequently, the cost estimates for tree removal are calculated with a standard fee on a per acre basis. As implementation plans are developed, the costs could be reduced through the use of partnerships, cooperative agreements, or the use of volunteers.

b You are correct. Under all the alternatives, visitor tours would continue over the entire battlefield and visitors would not be required to use the shuttles.

Marvin W. Gaskill

Dear Dr. Latschar,

I desire that Gettysburg General Management give support to the advancement of the new Visitor Center/Museum Complex. I want each generation to enjoy and learn from the past.

Sincerely,

Name Marvin W. Gaskill

Address

## COMMENTS

Dear Dr. Latschar,

I appreciate your commitment to Gettysburg National Military Park and our national heritage it symbolizes. Please continue to support progress on the GMP to protect this treasure. Thank you for the opportunity to be heard.

Sincerely,

Name RAGeidel RICHARD A. GEIDEL

Address

## RESPONSES

Richard A. Geidel

Dear Dr. Latschar,

I support the General Management Plan for the Gettysburg National Military Park & would urge you to do whatever you can to bring the final proposals to fruition.

Thank you.

Sincerely,

Name Reginald B. Gemmill, MD

Address

Reginald B. Gemmill

## COMMENTS

8/19/98

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Sir:

My name is Pamela A Gerlach, out of the four Alternatives for the Restoration of the Gettysburg Military Park, my choice is 'C' because of the Living History Ranger talks in the 1863 setting. For me the Living History Ranger was the main reason for my visit to the Park. I noticed with 'D' the Living History Ranger is non-existent. The picture that the Living History Program is a no-show. Parents with Children just love this program, especially the Children. I would like to mention since the Park with its Living History program catches the attention of the Children it is worth keeping. It is the Children as much as the parents that the story should be told.

a

On page 135 Interpretation and Visitor Experience for Alternative 'C' the Living History Program is detailed and mentioned, while on Page 147 the Living History Program is not mentioned.

a (cont.)

Alternative 'C' is the best solution when

## RESPONSES

### Pamela A. Gerlach

a The living history areas delineated on the figure and map on page 135 (Alternative C) would also be used under Alternative D. The cross hatching for those areas does appear on the map on page 146-47 but the text box on page 147 does not allow enough space to include the entire map legend.

you have the 1863 Restoration and the Living History Program

The Living History Program lets the visitor learn the story of the Battlefield with interest and impact compared to learning the story by reading the markers of the different states who were engaged on this Hallowed Ground.

Thank you for letting me share my views with you.

Mrs. Pamela A. Gerlach

## COMMENTS

Dear Dr. Latschar,

I support plan (option) C under the GMP for Gettysburg. I have read the entire book. Thank you.

Sincerely,

Name Paula Gidjines

Address

## RESPONSES

Paula Gidjines

**Dear Dr. Latschar,**

It's important that the General Management Plan move forward, and we appreciate the opportunity to be heard.

Sincerely,

Name Julius A. Giglio

Address

**Julius A. Giglio**

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>RE: National Park at Gettysburg<br>It is important that the General Management Plan move forward. We appreciate the opportunity to voice our concern<br>Sincerely,<br>Name Ingrid Gonzalez<br>Address | Ingrid Gonzalez |

## Chip Goodrich

Author: ChipG at NP--INTERNET
Date: 9/9/98 8:53 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Restoration Suggestions from A 7-Year-Old Boy
---------- Message Contents -----

Dear Mr/Ms. Superintendent,
Your tours are more fun for adults than kids. Kids get bored. I think kids should be free to run around and play and get to like the battlefield. Everybody likes climbing rocks at Devils Den.

Over the last two summers my family has visited Gettysburg three times--two times for my birthday party. Me and my friends had a great time at Spangler's Spring playing capture the flag. The Tarboxes at Battlefield Bed and Breakfast put on my party for me and my friends. Mr Tarbox taught us about calvery training and canon-firing. Getysburg is a great place for a birthday party. I want to have mine there again next year.

From, Chip Goodrich

## COMMENTS

**Dear Dr. Latschar,**

It's important that the General Mgmt. Plan move forward
I'd appreciate the opportunity to be heard.

Sincerely,

Name HAZEL GOSNEY

Address

## RESPONSES

**Hazel Gosney**

## Sandra E. Graham

August 15, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Re: New Visitor's Center/Museum Complex
Gettysburg National Military Park

Dear Sir:

With regard to the plan components for the new Visitor Center and Museum facility outlined in the Proposed Collections Storage, Museum and Visitor Center documents dated June 17, 1998, I wish to communicate to you my support of the direction taken by the National Park Service in negotiations with the Gettysburg National Battlefield Museum Foundation.

I applaud the reduction of retail facilities, and, in particular, the obvious recognition of the concerns of the Friends of the National Parks at Gettysburg, Inc.

As a member of the Friends of the National Parks at Gettysburg, Inc., I believe that this is a great step forward in providing protection to the Gettysburg National Military Park collection, as well as an enhanced visitor experience at the park.

It is my sincere hope that this project moves forward as swiftly as possible.

Very truly yours,

Sandra E. Graham

Sandra E. Graham

cc: Friends of the National Parks at Gettysburg

## COMMENTS

**Dear Dr. Latschar,**

I am writing to you as a long time member of the Friends of the National Parks at Gettysburg to urge you to help the General Management Plan move forward. Thank you for your consideration

Sincerely, Gerson Grosfeld

Name GERSON GROSFELD, Computer Scientist

Address

## RESPONSES

**Gerson Grosfeld**

Author: "Alice Guthrie" at NP--INTERNET
Date: 10/22/98 11:34 AM
Priority: Normal
TO: John Latschar at NP-GETT
Subject: Gettysburg management plan
---------- Message Contents

Dr. John Latschar, Superintendent:

I hope you will consider my comments on the Gettysburg management plan. I am encouraged that the NPS is considering such a comprehensive and innovative approach to preserving the Park and interpreting the history of the site.

I do have a couple of concerns with the draft plan. I urge you to concentrate on the basic elements of interpretation and the battlefield, and drop plans for the movie now. They can always be added later. My concerns are based on the cost, as well as the commercialization. I think getting visitors out to see the site is much more valuable.

a I also urge you to make sure that the majority of the revenues from the museum and associated visitor facilities are returned to the park - either directly or through the associated non-profit foundation. Don't allow concessionaires to be the major beneficiary of the revenues.

Sincerely,

Alice Guthrie

## Alice Guthrie

a All net proceeds realized by the Foundation from operations would inure to the benefit of the NPS.

## COMMENTS

September 5, 1998

Dr. John Latschar
GNMP
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar

I am writing with my comments on the recently distributed GMP for GNMP. Overall I am very pleased with Alternative C, which seems the best way to respect the commemorative period while allowing the visitor to see the field largely as it was. I do, however, have concern about the inclusion of reconstruction of pipe-rail fencing in this proposal. a

I have great personal interest in the commemorative period and have made study of Gettysburg's monumentation a kind of hobby in recent years. I doubt that there are many who have a greater sentimental attachment to the work of the commemorative period than I. One might think, then, I would be all in favor of rebuilding those fences. Yet I am not.

I am, you see, just old enough to remember those fences from visits in the fifties and have also studied the photos published with the Annual Reports for 1893-1904. While the fences may have set off the memorial grounds from the larger battlefield they also broke up sight lines and created the impression of farm fences where none existed at the time of the battle. On page 141 of the GMP it is stated that visitors will be able to both experience the field as it was and experience the commemorative period. Adding the fences may enhance the latter but i fear it will hinder the former, and will confuse the visitor who will be unable to tell which fence represents a historical feature and which a War Department intrusion.

I think a better way to honor the memorial period would be through faithful maintenance of the avenues and monuments. If fencing is to be reconstructed at all let it be at a site such as Coster Avenue where the memorial ground is in true need of separation from its modern surroundings

Sincerely,

David R. Gutknecht MD

## RESPONSES

### David R. Gutknecht

a The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of an historic commemorative feature for these purposes would be preferable to introducing a new modern design element into the Battlefield Commemorative Resource Area of the park. This is because the national significance of Gettysburg National Military Park extends not only to the battlefield and its 1863 landscape resources but also to the national park and its post-war commemorative landscape features. The creation of a national military park by the United States Congress in 1895 prompted battle veterans to transform certain portions of the battlefield into a formal park, which existed alongside preserved significant 1863 battle topography. Included in this transformation were the constructed and enclosed park avenues, additional monuments, tablets and cannon, and the observation towers.

Mr. Latschar

After Reading over the Draft for the General Management Plan + Environmental Impact Statement, I would like to see Alternative "C" proposed plan be used, As I believe this plan is for the best interest for the Gettysburg National Park.

a I would like to express my hope that all commercialism be kept out of the park.

THank you.

James Hammel

James Hammel
1st Corp Mem. of the FNPC

James Hammel

## James Hammel

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## COMMENTS

Dear Dr. Latschar,

I completely support your efforts to move the GMMP General Mgmt Plan forward. And the visitor center/museum complex should move as expeditiously as possible. All those nay-sayers — whose arguments are without validity and against the public good should be disregarded.

Sincerely,

Name Joan R. Hankey

Address

## RESPONSES

Joan R. Hankey

## Alex Harlett

Author: Alex Harlett at NP--INTERNET
Date: 9/1/98 8:53 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg Plan
---------- Message Contents -----

Dear Dr. John Latschar,

Hello. I am writing you in regards to the Draft General Mgmt. Plan and Environmental Impact Statement that I received from you (or someone in the NPS) recently. I am a college student so I will not have the time to do much more than skim through that enormous book. The only input I can offer is that I have been to Gettysburg Park twice in my life. Once with my family at 8 years of age and just last spring at 21 years old. I would like to be able to take my own kids there someday and not see farms or building on hallowed ground where so many died. I'd like to see it just as I have remembered, if not improved (but only to make it more historically accurate). I think that the landscape should be maintained as it is unless it is to be altered to the way it was in 1863.

Please let me know that you have received this letter. I would also appreciate it if you could let me know of some program and address where I could send donations from time to time to help preserve the park (remember though, I'm a poor college kid).

Thank you very much for your time.

Sincerely,
Alex Harlett

## COMMENTS

THE MCGORRISK GROUP, INC.

October 14, 1998

**VIA FEDERAL EXPRESS**

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Re: Draft General Management Plan and Environmental Impact Statement
Gettysburg National Military Park

Dear Dr. Latschar,

It is not without some discomfort that I write to you, given the conduct of affairs surrounding the proposed Visitors Center and Museum at Gettysburg National Military Park. Nonetheless, since these facilities are the center piece of the Park's General Management Plan ("GMP"), and being aware of how they were positioned, I would like to comment on the GMP, albeit briefly.

After reading the GMP, I am impressed with the considerable work and effort by many dedicated people, who have a love for and an appreciation of the Battlefield. The discussion regarding the overall landscape is detailed and well written, and no doubt stirs healthy debate as to the restoration of some of the land to its 1863 appearance. Better integration of the Borough of Gettysburg is evident, particularly as elements of The Gettysburg Battlefield Coalition's original proposal are incorporated into the presentation.

Based strictly on the draft plan, there is no real support presented for the economic viability of the GMP; the level of detail in the appendices is lacking. I would hope that the underlying pro forma receive an unbiased and appropriate analysis, with better due diligence than we've seen in the past. The last sentence on page 89 of the GMP, regarding a "300-seat cafeteria- type restaurant for visitors", is symptomatic of the entire financial approach. To merely state that "NPS believes such food service is appropriate
a and necessary" should be of concern not only to private restauranteurs in Gettysburg, against whom you will be directly, and inappropriately, competing, but also to anyone who appreciates hallowed ground. In any event, to forecast any food service operation with the degree of detail as presented in the GMP is a recipe for poor performance.

## RESPONSES

### Randy Harper

a NPS evaluated the impact of the cafeteria-style restaurant in the proposed museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

A sampling of questions that potential donors, individual and corporate, to this project should ask:

b
- Regarding the underlying land for the proposed Visitors Center and Museum, how much is being paid and upon what valuation criteria was the purchase price based? If the price exceeds fair market value, why should potential donors be asked to facilitate its acquisition?

c
- What is the underlying proforma for the Visitors Center and Museum? Upon what analysis is the annual operating exposure presented? How is depreciation being handled, and for whose benefit, because if it is used to offset cashflow, this is a problematic contradiction. The analysis presented is not of institutional quality, and it should be.

d
- What better parking management techniques would be applied that could help congestion that backs up into the streets, or to the off road parking that takes place at various monuments? How do you pay for the proposed shuttle?

e
- The Thomas Martin Associates work is detailed, but the study is presented as if it were back up material for a predetermined conclusion. What was the scope of their engagement? Why did they not go to the depth necessary to reflect the economic impact on the Borough and the operation of the proposed facilities?

I would encourage you, and the leadership of the National Park Service as well, to be more amenable towards the Borough, more than just reciting the number of public meetings that have been held, lest the deteriorating civility displayed in Gettysburg on October 1st shift from professional disagreement to personal revilement. The next monument on the Battlefield should not be to narcissism

Why not leave the LeVan property alone, improve the Fantasy Land tract for better parking, shift the Collection to downtown Gettysburg, and rehab the Visitors Center as the gateway to the Battlefield? No commercial development of any kind is necessary within the immediate environs of the Battlefield. We showed the NPS how this could be done, and can still do so.

Sincerely,

Randy Harper

JRH/rsh

cc: General





b The cost of the 45 acre property is $2.75 million, and was negotiated between the former owner and the Gettysburg National Battlefield Museum Foundation.

c Proformas for the proposal selected for negotiation were released to the public on June 15, 1998 by the Gettysburg National Battlefield Museum Foundation. They provide the underlying basis for the analysis performed for NPS by Tom Martin. NPS believes that the analysis is sufficient for the GMP level of decision making. If an action alternative including this proposal is selected by NPS after appropriate environmental planning is completed, additional economic assessment and analysis would be completed.

d Potential solutions to the problems you mention are discussed in the draft GMP/EIS on pages 95-96. The park would use a variety of solutions, including the shuttle, various traffic management improvements, improved monitoring and other actions to manage congestion. Costs for the shuttle have been added to the cost estimates.

e NPS defined the area affected by the proposed alternatives as the communities within which the park is located and those that are adjacent to it. Visitor facilities within the park are located in five townships, and commercial services for tourists are located in these townships, adjacent townships and the Borough of Gettysburg. For this reason, the economic assessment incorporated all of the communities that might be affected by the alternatives incorporated in the draft GMP/EIS.

NPS discussed the affected area it felt was appropriate during public scoping and resource workshops. During the various public workshops, NPS was asked to consider the impacts of the proposal on specific segments of the tourism economy, and this was done. However, NPS was not asked to perform separate economic assessments during these scoping meetings.

The draft GMP/EIS notes that although some individual businesses may be affected by the proposal, the overall economic impacts from the action alternatives on the economy of the affected area would be positive. Therefore, NPS does not believe that a separate analysis of the economic impact from the proposal on the Borough of Gettysburg would provide additional useful information.

## COMMENTS

August 20, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent Latschar,

Please note my new mailing address.

I received the draft *General Management Plan and Environmental Impact Statement* for Gettysburg National Military Park. I strongly support Alternative D, Maximum Park Rehabilitation, because I believe it will provide future generations with the greatest understanding of the sacrifice made at Gettysburg on behalf of freedom. As you know, 51,000 Americans were casualties in that titanic 3-day struggle.

Congress should appropriate sufficient funds to cover the costs of implementing Alternative D, because it will tell the story of our nation for centuries to come. As one with six family members who served in the Union army, I urge you to spare no effort in making this dream a reality. My e-mail address is Thank you.

Sincerely,

Dave Hawk

Dave Hawk

## RESPONSES

**Dave Hawk**

Dear Dr. Latschar,

Sir, My first trip to the East was as a reenactor at last July's 135th Anniversary of the Gettysburg Battle. What I experienced has been of paramount value! Please do your utmost to bring to speedy fruition the merits of the General MANAGEMENT PLAN.

Thank You

Sincerely,

Name Mr. J. A. Hawkins

Address

**J. A. Hawkins**

## COMMENTS

William R. Hawkins

October 6, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Re: Draft General Management Plan and Environmental Impact Statement

Dear Sir,

I write to express my strong support for the subject plan. You and the National Park Service are to be commended for the creative approach you have adopted to preserve and vastly improve a national treasure. The restoration of the Major Battle Action Area to its appearance in 1863 will greatly enhance a visitor's ability to understand and appreciate what "they did here". Among the areas most vitally in need of restoration are the woods in front of the Pennsylvania Memorial which conceal the monument to Colonel George L. Willard and negate any sense of the exposed nature of the right flank of Kemper's Brigade during the Pickett-Pettigrew-Trimble charge, and, especially, the woods to the west of Devil's Den. I dream of the day when I will be able to stand near Smith's guns and imagine seeing Robertson's Texans emerge from the woods on Warfield Ridge, but realize that at 66 time is against me and that this pleasure will probably have to be reserved for my grandchildren.

As an inveterate Civil War battlefield trekker, I am naturally interested in the plan to restore and maintain historic trails. While the maps in the draft are necessarily sketchy, I am intrigued by the one that appears to follow present day Slyder Lane and the one that runs through the Rose farm to the fringes of the Wheatfield. As to the former, I hope consideration would be given to erecting a permanent narrow foot bridge over Plum Run; and as to the latter I hope it would be open to Park visitors. If a foot bridge is not feasible, perhaps the clearing I expect will occur in Plum Run gorge (I cannot believe Benning's Georgians attacked through the current growth) will permit access to Devil's Den along the western bank.

Again I salute you and the Park Service for developing a plan that will provide a more meaningful experience for visitors to the park in generations to come. Let us just pray that those who seek to advance their own hidden agendas under the euphemism of "preservation" do not prevent or delay its implementation.

Yours truly,

William R. Hawkins

cc: FNPG

## RESPONSES

William R. Hawkins

12 October 1998

Superintendent John A. Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Superintendent Latschar:

I have the following comments on the *Draft General Management Plan/Environment Impact Statement*, dated August 1998:

1. I agree that Alternative C is the best alternative. Alternative D would be my first choice; unfortunately it is not practicable because of cost. The most attractive feature of Alternative C is restoration of the terrain in the Main Battle Action Areas. It would give a visitor a much better idea of why certain positions were so important. It was hard for me to understand the importance of upper and lower Culp's Hill due to all the trees.

a 2. Page 131 of the Draft GMP - It seems as if a shuttle, although proposed in all alternatives, is more of an afterthought that a serious item. There were no specific details as to routes, frequency, cost, or impact. I have a bias on this issue because I cannot drive due to my vision. When I visited GNMP in April 1996, I walked to Little Round Top, to the Virginia Monument, Culp's Hill, etc because that was the only way to get a quality visit of the battlefield. Fortunately, I am healthy enough to walk a great deal. A tour bus enabled me to see areas too far to walk to, but riding a bus isn't like being on the ground itself. Visitors that do not drive, and cannot walk long distances, really do miss the opportunity to really appreciate the terrain. I never fully appreciated the odds faced by Confederate infantry on 3 July 1863 until I walked from the Virginia Monument to the Bloody Angle.

I would like to see a shuttle that runs every 30 to 60 minutes, and covers most of the key positions in the battle. A ticket could be purchased that would allow a visitor to dismount at specific stops, see what he wanted, and get back on later. The shuttle could be merely a form of transportation without guides or narrations. Current tour operators could still offer guided tours to those interested.

A shuttle that covered most the key positions would offer a number of advantages. Visitors like myself could go to more areas of GNMP. A shuttle system could cut down vehicle traffic; especially if a shuttle system entirely replaced POVs in the park. A shuttle system could help reduce the congestion around the most-

## Kurt Helmig

a A GMP is used to set forth a basic management philosophy for a park and provide a framework for future decision-making. The draft GMP/EIS is only the first step in the planning process that would lead to a final plan for a shuttle system. At that time, specific details as to routes, frequency and other items would be developed. NPS did consider the general impacts from such a system, and they are discussed in Chapter 4 of the draft GMP/EIS. Conceptual costs were inadvertently left out of the cost estimates shown in the appendix of the draft GMP/EIS. They have been added to the final GMP/EIS.

## COMMENTS

visited areas. It was common to see buses stop at a particular site (e.g. Devil's Den), and watch the hordes descend. I just had to wait a short time, and everybody went back to their buses, off to another site.

Thank you for sending me a copy of *the Draft General Management Plan/Environment Impact Statement*. I appreciate you going the extra mile to let the public know what's going on. There is a lot of material in the Plan that is interesting, in and of itself, for any student of the battle. I especially liked the drawings and maps of the terrain in 1863.

Sincerely Yours,

Kurt Helmig

Kurt Helmig

## RESPONSES

## Robin E. Hemperly

September 27, 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear John,

It has been a few months since you visited our Round Table in Lebanon PA, and considering you still came after your long trip to Washington DC it was very much appreciated. I hope you received the card of thanks signed by every member of the Round Table.

Like thousands of other interested persons who love the battlefield like I do, I received my copy of the GMP and read almost all of it. I was still undecided how I felt about a private/federal partnership, and a little upset that we were expected to read and comment on the plan in only 60 short days. Then I took a trip to Petersburg with the Guides Association and I changed my mind. We visited Pamplin Park while we were there and that is what changed my mind. If you have never been there, you should visit. Nothing tells the story of how great, and fast, private money can build what takes the federal government three times as long to complete. That place is fantastic, and getting better. There was no red tape, unbelievable meetings, and trying to please every single sole on the face of the planet. The thing is built, and the breast works are SAVED !! I fear that the only one that is still looking out for the artifacts and the restoration of that hallowed ground is you. The other remarkable thing about Pamplin is a new museum they are building for the foot soldier called "The Soldiers Museum". The building is well underway and will be really remarkable. The neat thing will be, when you enter the building you will see 13 soldiers. Some white, some black, irish .. etc. You get to pick which one you want to be. You then get a set of earphones and the soldier talks to you while you tour the museum. He tells you what he thought of what you are seeing as you go, then at the end you find out what happened to your soldier.

I have the most sincere admiration for the work you are doing, and I hope that you will be strong enough to withstand the hardships that are being placed on you for simply doing the right thing. All the ideas that you have are being realized at Pamplin right now, today !

I am worried that everyone is calling for congressional hearings and delay of the plan approval, while all the time the artifacts continue to rot away. A lot of people have said that you are making a much bigger deal out of the artifacts rotting than is true.

## COMMENTS

This I don't know because I missed the two days that you were allowing visits to see the artifacts. I do know that I am very concerned about them and what will happen to the paper artifacts and a lot of the leather ones. While I don't feel real good about Mr. Kinsley being the private partner, we do have to trust those who are put in a place to work out the deals for us, john q. public. I am one citizen who does trust you.

One of the things I really did not feel comfortable with was the way things seemed to be secret. When financial questions were asked, vague answers were given, if at all. While I know that some negotiations are very sensitive, still, we the people do have a right to know. I felt that when you were with our group you were very open to answer any questions that we had, and when you left us I felt a little better.

My comments regarding the restoration of the sacred ground where the current visitors center and cyclorama centers are now located is simple. This ground must be restored. To much blood was spilled by many brave Americans to have it be buildings and parking lots.

a My comments regarding your view of future traffic and how to handle it I am still a little worried about. I feel that I should be allowed to drive in my car anywhere buses are allowed, and places some are not allowed. I think the roads in the park should remain exactly as they now are. There are times when I finish with a 4 hour walk with a Ranger or guide or seminar and just want to find a quite place on the field to relax until I feel like heading home. If you change the roads, I will not be able to do this as easily as I now do.

In summary, I feel that you, on our behalf, need to press forward with the plan, not only for the visitors center, but entire Park. Working for a government too, and having to put together a 537 sewer plan, a ten year recreation plan and a comprehensive plan to address growth in the entire Township over the next ten years, I can appreciate the enormous task you have before you. You are on the right track.

This concludes the comments I have on the GMP for Gettysburg.

If there is anything further I need to do, please feel free to give me a call. My work number is from 7:30 – 4:00. My home number after five is
and my e-mail address is

Thanking you in advance,

Robin E. Hemperly

Mrs. Robin E. Hemperly

CC: Friend of the National Park at Gettysburg
Camp Coleman Civil War Round Table
Gettysburg Discussion Group – online
National Civil War Round Table – online

## RESPONSES

a None of the action alternatives would prevent visitors from using their cars to tour the battlefield. In order to provide access to places on the battlefield where traffic congestion is creating problems, the draft GMP/EIS does suggest limited and seasonal restrictions on vehicular traffic on certain avenues. However, those would only be imposed when heavy traffic congestion and gridlock at popular places on the battlefield threatens to make visitor access difficult or impossible. When that occurs, the draft GMP/EIS suggests that alternate transportation in the form of a shuttle would be available to ensure that visitors could access all points of the battlefield. Visitors would not be required to use a licensed battlefield guide. No avenues would be eliminated as a result of any of the GMP alternatives.

**Dear Dr. Latschar,**

Please continue your good work and keep the GM.P. moving forward. You do have many who believe in what you are doing - for us and our country.

Sincerely,

Name Mr. Robin E. Hemperly

Address

**Robin E. Hemperly**

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>I FEEL THAT IS VERY IMPORTANT THAT THE GENERAL MGMT PLAN MOVE FORWARD, ESPECIALLY IN REGARDS TO THE PROPOSED NEW VISITOR CENTER & MUSEUM COMPLEX.<br>THANK YOU!<br>Sincerely,<br>Name RICK HENDRICKSON<br>Address | Rick Hendrickson |

## H. W. Henzel and A. K. Henzel

H W Henzel

September 25, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

RE: GMP & EIS

Dear Doctor Latschar:

In comformance with the instructions contained in your letter of transmittal dated August 14, 1998 and accompanying the Draft GMP and EIS, we hereby exercise our right to make comment.

1. We enthusiastically and thoroughly endorse the proposed Alternative D for adoption and implementation.

2. Furthermore, we vigorously endorse the plan to remove the present Visitors' and Cyclorama Centers from the Battlefield and restore those areas to their 1863 condition.

H. W. HENZEL

A. K. HENZEL

## COMMENTS

Sept 11, 98

Dr John A. Latschar

Sir;

Just a short note to state my appreciation for the information sent to me about the building project proposed. The people interested in history must stand up for the preservation of all sites, because people that are not would like to wipe them out as long as there is a chance for a fast dollar.

Through the years I have noticed the large increase in interest at Gettysburg which is a real paradox both good and bad.

So when the building is finally built I hope it is blended in so well we can use it but hardly notice it.

Since I live over here near the border of ohio the only meeting I might make is the Sept 24th in Pittsburgh. Location information please! – (done 9/28/98)

My view is, that this project is getting thoughtful consideration.

Sincerely,

Howard E Hillman

## RESPONSES

**Howard E. Hillman**

**Dear Dr. Latschar,**

IT'S IMPORTANT THAT THE GENERAL MANAGEMENT PLAN MOVE FORWARD. WE APPRECIATE THE OPPORTUNITY TO BE HEARD. THANK YOU

Sincerely,

Name Frank G. Hills

Address

**Frank G. Hills**

Author: lholder (Len Holder)
Date: 10/8/98 9:13 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: tree removal
---------- Message Contents ------

Dear Mr. Latschar:

a I am writing to urge you to reconsider the plan to remove 576 acres of trees from the Battlefield. I understand your interest in restoring the Battlefield as nearly as possible to the way it was at the time of the battle, but I firmly believe that saving these trees has greater priority. Clearly, it is impossible to restore everything to the original state at the time of the battle. I can think of several things I would rather have removed than these trees, such as the commerialism along Steinwehr Avenue, but I know that can't be done. I believe visitors can get a good idea of the conditions at the time of the battle without removing the trees, and I think they would rather have the beauty of the trees than an unobstructed view.

Since I moved to Gettysburg 34 years ago, I have seen the Park Service spend a great deal of money on projects of dubious merit. I hope this record won't be compounded by spending more than $2,000,000 for removing trees that are better left as they are.

Sincerely Yours,

Leonard I. Holder

## Leonard I. Holder

a NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the GMP, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

OCT-22-1998 09:33

P.03

FW: Gettysburg Battlefield Proposed Plan and the Visitor's Thu, Sep 10, 1998 4:57 PM

From: 'Zoe Lofgren'
To: one
Date: Thu, Sep 10, 1998, 9:22 AM
Subject: FW: Gettysburg Battlefield Proposed Plan and the Visitor's Center

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Zoe Lofgren
Member of Congress
zoe@lofgren.house.gov

---

>From: Randy/H
>To: zoegram@lofgren.house.gov, George.Miller-Pub@mail.house.gov,
senfarr@mail.house.gov, gretchen.gipson@mail.house.gov,
senator@boxer.senate.gov, senator@feinstein.senate.gov,
senator@bumpers.senate.gov, senator_specter@specter.senate.gov,
bruce_babbitt@ios.doi.gov, Bob_Stanton@NPS.GOV, jlrussell@aristotle.net
>Subject: Gettysburg Battlefield Proposed Plan and the Visitor's Center
>Date: Thu, Sep 10, 1998, 4:54 AM
>

>Randy Holderfield
>
>
>
>Via E-mail and US Postal Service
>
>RE: Gettysburg Battlefield Proposed Plan and the Visitor's Center
>
>To whom it may concern:
>
>I have been following the saga of the proposed new public/private
Visitor's
>Center since I heard Dr. Latschar was coming to speak about it here in
San
>Jose. Many were dazzled by Dr. Latschar's salesmanship when he spoke.
I came
>away from his talk with more questions than answers and some sense of
>amusement at the things he seemed to imply about Congress. But I
chalked up
>his comments about the latter to his attempts to justify his partnership
with
>Mr. Kinsley by making Congress appear the "bad guy" in the eyes of those
of us
>who care deeply about that Ground.
>
>Then I came across this little piece in the Sept. 6, Evening Sun in which
>David Barns, chief of Public Affairs for the National Park Service, was
quoted
>as saying that "Any decision to extend the General Management Plan
[comment
>period] would not come from Washington but from Gettysburg. Park
>Superintendent John A. Latschar is the person with the authority to make
that

Page 1 of

## Randy Holderfield

# COMMENTS

# RESPONSES





>decision.'
>
>I am even more amazed at that comment. I didn't elect John Latschar to
>anything and neither did anyone else. He is a bureaucrat, a public
servant
>employed to maintain mine and a few hundred million other citizen's
property:
>The Gettysburg Battlefield. Oh, excuse me, Dr. Latschar likes to call
it a
>"Park". That may be the proper legal designation for that Ground, but
that
>land is most definitely something more than the noun "park" suggests.
The
>bottom line is that I do not like a non-elected official calling the
shots
>about something like this when it is obvious that he has somewhat of a
bias
>and an agenda to see his "baby" built when, where and how he wants it.
>
>I would ask the Congressmen and Senators, and Secretary Babbit to advise
me
>whether it is true that Dr. Latschar holds more power over this issue
than our
>elected representatives do. I have also heard rumors that Congress is
>powerless to alter or stop the proposed General Plan, even if they would
'like
>to do so. Please advise if this is true, also. I find it hard to
believe
>that the most enduring symbol of what this Nation is and was is out of
the
>control of you we elected to look out for our interests.
>
>I also found an article in the Gettysburg Times of August 31 about some
>apparent confusion on the part of the National Park Service about the
"true"
>costs of this proposed project. Such issues as that are why I think the
>comment period should be extended and Congress should scrutinize the plan
>thoroughly and to the extent of a GAO audit, if necessary. I have a
copy of
>the plan and have read it. I don't see that the numbers add up. But
then I
>am just a citizen who has to depend on the wisdom and the intelligence
of my
>elected officials to look out for mine and my daughters' interests in
>preserving out common heritage. I will not depend on Dr. Latschar to
assure
>me that the numbers (at least the few numbers his plan provides) are
correct.
>He has made it clear that his plan will be implimented. I admire his
devotion
>to what he must feel is a proper way to run a "park". But I disagree
with him
>as to how to most economically preserve artifacts, how educate children
about
>our nation's history, how to preserve the land sacred to all of us, and
on the

OCT-22-1998 09:34 P.05

FW: Gettysburg Battlefield Proposed Plan and the Visitor's Thu, Sep 10, 1998 4:57 PM

>significance of that Ground. I do not consider him an unbiased arbitrator on
>this issue.
>
a >I fear this 'public/private' scheme is an opening wedge to commercializing
>battlefield land instead of working to preserve that land. And those who
>support it are using the excuse of a stingy Congress to promote their vision
>of what is to me, a cold, sterile (very expensive) building sitting on land
>men risked and gave their lives for.
>
>I think we have lost sight of one fact. There ARE some things government does
>better than private business. Looking out for the public interest may not be
>profitable in the long run, then what?
>
>The donations and the money borrowed for that building could be far better
>used for other purposes and the alleged reasons for its being built better met
>by cheaper means. As far as the educational part of the Plan, the battlefield
>itself teaches, no bells and whistles needed, just a concerned adult to walk
>it with a child and maybe to later to share a book with that child.
>
>Believe it or not, there are many of us here in California who care deeply
>about that land in Pennsylvania. I know many that go there every year and
>many who shed tears over men that died over a hundred years ago there and for
>the idea that men would face such horrors as they faced for ideas they thought
>noble. Dr. Latschar's road trip to California at taxpayer expense to promote
>his pet project did not change many minds.
>
>As you can tell, I am opposed to this project. But if it is to go ahead, I
>want to be sure that it is the best possible Plan there is. I want the Plan
>examined in detail on all issues, and I want to know what, if any alternatives
b >where considered or might be considered. I am beginning to doubt that any
>alternatives where looked at.
>
>At the very minimum, there needs to be more time to examine this Plan, and
>Congress must take back it's duty in this matter in the interests of we who
>have elected you and properly consider its merits and any other

Page 2 of 4

a The intent of the draft GMP/EIS is to rehabilitate and restore the areas of the park where major battle action occurred. One of the mechanisms to do this is to relocate existing visitor facilities, including facilities like visitor centers, horse trails, parking areas and youth campgrounds, to sites that are outside of that most important land or to locations that can protect critical resources. Alternatives B, C and D in the draft GMP/EIS each propose relocation of some or all of these facilities from their current locations in the Major Battle Action Resource Areas of the park to other areas that did not see major battle action.

b The current visitor center and museum facilities at Gettysburg NMP are located on land that was central to the Battle of Gettysburg and they are visible from large portions of the battlefield as contemporary intrusions on the battlefield's historic setting. In addition, the facilities are greatly inadequate to meet visitor and curatorial needs. For these reasons, construction of new museum and visitor center facilities in a more suitable location has long been an objective of the park.

Between August 1995 and April 1996, NPS prepared a *Draft Development Concept Plan/Environmental Assessment* (DCP) to explore alternatives for the needed facilities. Development Concept Plans are tools that NPS uses to solve facility concerns. The DCP included four alternative concepts for the new facilities: (a) a no action alternative, (b) building a collections and archival storage facility and leaving the Cyclorama and visitor centers as they are; (c) building a new Cyclorama building combined with collections and archival storage and renovating the existing visitor center in place, and (d) building a new combined facility incorporating all these uses. The DCP was put out for public review for 45 days in April 1996. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. The majority of the public comments which were received agreed with the NPS's choice of Alternative D, building a new combined facility in a new location.

Based upon that public response, NPS released a Request for Proposals in December 1996, seeking a partner or partners to assist in the accomplishment of the DCP's preferred alternative. The RFP process resulted in the selection of a proposal for negotiation in November 1997, and a revised proposal in

OCT-22-1998 09:35 P.06

Fw: Gettysburg Battlefield Proposed Plan and the Visitor's Thu, Sep 10, 1998 4:17 PM

alternatives
>to it.
>
>Respectfully,
>
>Randy Holderfield
>
>cc: John Latscher
> Gettysburg Times
>
>mcgrath@lofgren.house.gov
>George.Miller-Pub@mail.house.gov
>sam.farr@mail.house.gov.
>gretchen.gipson@mail.house.gov
>senator@boxer.senate.gov
>senator@feinstein.senate.gov
>senator@bumpers.senate.gov
>senator_specter@specter.senate.gov
>bruce_babbitt@ios.doi.gov
>Bob_Stanton@NPS.GOV
>OPPT_Public_Affairs_Office@nps.gov

Page 4 of 4

TOTAL P.07

TOTAL P.06

June 1998. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal.

Scoping for the park's new GMP/EIS had been initiated in April 1997. Based on the public input received on the DCP, the draft GMP/EIS process to date and other public comment, the NPS determined that it was desirable to incorporate the issues of visitor use and interpretation at the visitor center and museum facilities as an element of the forthcoming GMP/EIS.

Heritage of Honor, Inc.

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

15 October 1998

Dear Dr. Latcher:

Attached are my 25 comments regarding the Draft General Management Plan and Environmental Impact Statement. I hope that they will be of assistance to you and your fine staff.

Also attached is the Customer Comment Card used here at Ft Myer.

Sincerely Yours,

Mr. Kim B. Holien

"We celebrate the past to awaken the future"
— John Fitzgerald Kennedy

## Kim B. Holien

RESPONSES

COMMENTS

10/15/98 08:18 ☎703 696 2878 MS FT MYER 003

GARRISON COMMANDER
FORT MYER MILITARY COMMUNITY
ATTN: AMWY-CM
204 LEE AVENUE
FORT MYER, VIRGINIA 22211-5003

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FORT MYER, VIRGINIA 22211-5003

FORT MYER
MILITARY COMMUNITY

Fort Myer Military Community

## *Customer Comment Form*

*As part of the FMMC's effort for continuous improvement, we are asking for your help!*

*Our staff is dedicated to providing excellent service to you. If we have accomplished this, we would like to commend those responsible. On the other hand, if we have not accomplished this, we want to know.*

*Please take time to share your opinions with us.*

FMMC FM 36
1 MAY 97

EDITION OF 1 OCT 96 WILL BE USED UNTIL EXHAUSTED.

RESPONSES

COMMENTS

## Your Opinion Counts!

Please take a few minutes to complete this form. When you are finished, fold it in half, seal it, and drop it in the mailbox. Use a pencil or black ink to rate each item. Only fill in one box (☒) per line

How do you rate the following?

| | Excellent | Good | Average | Poor | Not Applicable |
|---|---|---|---|---|---|
| • Prompt service | ☐ | ☐ | ☐ | ☐ | ☐ |
| • Courteous service | ☐ | ☐ | ☐ | ☐ | ☐ |
| • Value to you | ☐ | ☐ | ☐ | ☐ | ☐ |
| • Staff professionalism | ☐ | ☐ | ☐ | ☐ | ☐ |
| • Facility appearance | ☐ | ☐ | ☐ | ☐ | ☐ |
| • Meeting your expectations | ☐ | ☐ | ☐ | ☐ | ☐ |
| Overall, the quality of the services and facilities was ... | ☐ | ☐ | ☐ | ☐ | ☐ |

Would you use the service/facility again? ☐ Yes ☐ Maybe ☐ No

To which group do you belong? (check only one)

☐ Active Duty ☐ Active Duty Family Member
☐ Civilian ☐ Civilian Family Member
☐ Retired ☐ Retired Family Member

Facility Visited _____ Organization Providing Service _____

Date _____

*DO NOT WRITE BELOW THIS LINE - FOR OFFICE USE ONLY*

| For | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|---|---|---|---|---|---|---|---|---|---|---|
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Org | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |

## Voice of the Customer

Please share your ideas, suggestions, or concerns with us.

_____
_____
_____
_____

Service provided by whom? _____

Would you provide us with the following information in the event we need to contact you?

Customer Name (optional) _____

Address _____

City, State, Zip Code _____

Telephone Number _____

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AUTHORITY: Title 5, USC, Section 301

PRINCIPAL PURPOSE: To evaluate and document the quality of programs and services provided to customers of the FMMC.

ROUTINE USE: To continually provide data that will allow the FMMC a method by which to evaluate and analyze the way programs and services are being received by customers.

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ ☐ |
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | |
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | |
| | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ | |

| COMMENTS | RESPONSES |
| --- | --- |
| GETTYSBURG MANAGEMENT PLAN – Comments by Mr. Kim B Holien<br><br>1. PROFESSIONALISM – all staff should receive professional training and certification in relationship to their various duties/assignments. Along with this should go recognition especially in the area of pay/promotions/assignments.<br><br>2. BE PRO ACTIVE NOT REACTIVE - as far as current staffing/budget limitations allow try to anticipate future concerns/problems/planning, events by getting ahead of the time curve. This will assist your already hard working and dedicated staff to carry their intensive workload as it increase in the years to come.<br><br>3. CUSTOMER COMMENT CARD – Copy from the Ft Myer Military Community is attached for your review. These will be found to be of significant assistance in evaluating the public's response to you and your efforts.<br><br>4. WEBSITE – if not already in place one should be developed as soon as practical. This will greatly assist educational groups and hopefully decrease the telephonic and written workload that your staff must deal with every day.<br><br>5. ASSISTANCE BY GRAUDATE SCHOOLS – in a trade off for course credit (but not requiring any money from the NPS) perhaps graduate students from various university disciplines could be brought on staff to assist with workload and extra projects in return for their receiving both training in the various disciplines needed to run the various parks at Gettysburg course credit<br><br>6. BATTLEFIELD AFTER NEXT - in setting forth your current Gettysburg Master Plan perhaps you should also be looking at 'The Battlefield After Next' as we term it in the Army vis a vis the next GMP for the time period of the 150th Anniversary in 2013.<br><br>7. PREPARATIONS FOR THE SUSSEQUENTIAL IN 2013 - currently you are less than 15 years away from what could be a massive 150th Anniversary in 2013. Based upon the 1963, 1988, and 1998 celebrations along with the forthcoming 2003 and 2008 events perhaps a computer preparation plan should be started if staff are available. This could tie into #5 above.<br><br>8. GUINN WOODS AGREEMENT – You mentioned in your GMP the Guinn Woods Agreement part of which was to bring your administrative staff under one roof. May I applaud you for this approach to efficient management of staff, time and resources. Here in Washington the same procedure was successfully tried with the building in 1970 of the Forrestal Building on Independence Avenue to bring all the various DOD admin offices together under one roof. Until DOD was moved from the site in 1979 it was a major plus up in the saving of time, resources and personnel. | |

Kim B. Holien

9. CHANGE FOCUS AREAS TO HELP IN EROSION – Because of the volume of visitors it is understandable that this is a major practicable - but not glamorous - problem. Perhaps contacting the American Turf Association and requesting their assistance through a certified board of their professionals along with monies would assist you in this area.

10. OLD RAILROAD/TROLLEY LINE/ANGLE AND LITTLE ROUND TOP AREAS At the turn of the last century there was built the railroad/trolley line across - significant areas of the battlefield, inparticular that of the field in front of The Angle and the area behind the 20th Maine position on Little Round Top. The latter is especially bothersome to me as a professional military historian upon leading Staff Rides of Army Officers to the battlefield. Could not corrective measures be taken here to return these areas to there original landscaping if the historical records and staff time/money exist?

11. ADOPT AN ARTIFACT – Via my membership in the Friends of the National Parks at Gettysburg I take note of the excellent concept of adopting a monuments, etc. Could not the same concept be applied to your magnificent artifact collection under the dedicated care of Mr. Mike Vice. In this area I would suggest having various military/historical societies (e.g. Sons of Union Veterans) adopt artifacts that need crisis care or the purchasing of equipment necessary to preserve such material culture.

12. FILM CONSERVATION – motion picture film abounds about events at Gettysburg. Perhaps to assist you in the staffing and financing of such a program the Kodak Corporation could be of assistance.

13. PHOTO CONSERVATION – as per above except with prints.

14. CYCLORAMA – the restoration and moving of this priceless painting of Pickett's Charge could perhaps be made more possible by having Sherwin Williams Paint Corporation assist in the cost of the restoration.

15. PHONES BY MCI – upon taking your last Gettysburg Battlefield Guide Examination in December of 1997 and returning in January of 1998 for a follow-up meeting I heard a large number of Guides and others talk about the problem of communication on the park grounds in the case of an emergency. Perhaps by contacting a major Cell Phone Corporation such as MCI and having them donate Cell Phones for the NPS Staff, the volunteers and the Guides this problem could be eliminated at no cost to the NPS.

16 ROAD NETWORK – You have to make do with a 19th Century country road network and an 1890s US Army battlefield Road network (exception being the current and future bypass). At no cost to the NPS perhaps requests can be made of both Graduate Schools (as per #5) and the Federal Highway Administration here in Washington. Federal agencies should be willing to assist one another in planning both

| COMMENTS | RESPONSES |
|---|---|
| future battlefield road systems and its conjunctions with the local road network of the future. | |
| 17. FARMING – you make mention in your GMP about restoring as much of the battlefield farming areas to what they were at the time of the battle. Could not this area of your planning be assisted by the financial cooperation of a major farming corporation such as ADM ? I believe it is worth looking into to assist the NPS. | |
| 18. WOODS – wood restoration can be both time consuming and expensive. Perhaps graduate forestry schools in Pennsylvania/Virginia (e.g. Virginia Tech) could assist you here along with the American Forestry Association. Worth checking out. | |
| 19. EISENHOWER FARM - for repairs, ongoing maintenance costs, etc., at the Eisenhower Farm perhaps various responsible World War II Veteran Groups or current groups such as The Retired Officers Association could be made aware of various needs that the NPS has at this site and request assistance accordingly. IKE's name is still magic with the US Army officer corps, active and retired. | |
| 20. LINCOLN – With all the recognition of the public with Mr. Lincoln and his visit to Gettysburg perhaps a corporation such as the Lincoln Life Insurance Corporation and or others could be brought on board to assist with costs connected to Lincoln at Gettysburg. | |
| 21. ARMY TOWERS - you have two complete and one partial US Army observation tower at Gettysburg. To assist you in maintenance of these and perhaps even restoration of the partial one could not the Department of the Army be contacted for this vis a vis their Reserve Components to do this as part of their training. I think its worth a letter. | |
| 22. CANNONS – as noted in #11 regarding the adoptation of monuments already in useage and the possible future use of such adopting of artifacts could not groups such as the Order of Saint Barbara , the American Ordnance Association, the Association of the United States Army, etc., be approached to assist in the financial maintenance of the hundreds of cannons you have at the battlefield. This could be a significant cost and staff time savings. | |
| 23. WAR DEPARTMENT SIGNS – as per #22 could not the cost of repainting, replacing, repairing these hundreds of valuable historical markers be assisted by such groups as the US Army Military History Institute, Leavenworth, and West Point. | |
| 24. SIGNSTANDARDIZATION - on approaching the battlefield the brown sign standardization is of assistance in guiding individuals/staff rides to the battlefield proper. But upon driving around the battlefield itself itself many signs are faded, missing, out of date. Could not a concerted effort be made to correct this matter. Perhaps the American Sign Association could assist in the cost of production of these. | |

Kim B. Bolien

25. REMOVING THE TOWER – a goal that most people want to see happen. Could this not be made into a Win – Win situation by having the useable parts of the Tower go into the building of a children's wing at a local hospital or a Day Care Center or an Retirement Home. By a positive recycling of the Tower many good things could evolve especially its removal if the current owner thought he would gain maximum tax advantages and public relations benefits.

## COMMENTS

Dear Dr. Latschar,

AFTER EXTENSIVE STUDY OF THE GMP DRAFT, I HAVE DECIDED THAT ALTERNATIVE D WOULD BEST SERVE THE GNMP AND ITS MILLIONS OF DEDICATED VISITORS. TO DO EXTENSIVE REHABILITATION OF THE ENTIRE PARK WOULD PROVIDE THE VERY BEST INTERPRETIVE VALUE.

THANK YOU FOR YOUR TIME AND CONSIDERATION.

Sincerely,

Name GREG HOOVER

Address

## RESPONSES

Greg Hoover

**Dear Dr. Latschar,**

MY GRANDFATHER, FROM ALABAMA, SERVED AT GETTYSBURG. PLEASE DO ALL YOU CAN TO PRESERVE AND IMPROVE THE PARK.

Sincerely,

Name William H. Horn

Address

William H. Horn

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>We appreciate the opportunity and the need to be heard.<br>It is important that the General Management plan move forward! PLEASE!!<br><br>Sincerely,<br>Name Rod Hoyt, Member Friends N.P. Hettysburg<br>Address | Rod Hoyt |

**Dear Dr. Latschar,**

In Regards to the Gettysburg new visitor center etc. It's important that the General Management Plan move forward. We appreciate the opportunity to be heard.

Sincerely,

Name Mr. Mrs W. HUENKE

Address

**Mr. & Mrs. W. Huenke**

## COMMENTS

Author: Thad Humphries at NP--INTERNET
Date: 10/2/98 3:22 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: senator@robb.senate.gov at NP--INTERNET
CC: senator@warner.senate.gov at NP--INTERNET
Subject: The New Vistor Center
---------- Message Contents

Dr. Latschar,

Best of luck in obtaining approval for you proposed Visitor Center and park Management Plan. I have heard and read a great deal of discussion on the Visitor Center and the Management Plan. I believe what you are planning is the best that can be done under the circumstances. More than that, you should be congratulate for a creative approach to overcoming the limits you have been saddled with.

I think it is a disgrace that Congress has not allocated sufficient funds to allow this to protect and preserve the collections at Gettysburg. Too many pieces of our national heritage--the Wilderness, Manassas, Cold Harbor--are threatened, disappearing, or lost. I hope and pray you can preserve Gettysburg.

Yours,

Thad Humphries

---

Thad Humphries
Software Engineer (aka, Nerd)

"Gettysburg.... You cant understand it. You would have to be born there."
- Wm. Faulkner, 'Absalom, Absalom!'

## RESPONSES

### Thad Humphries

ANN IRVING

October 16, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar:

I have read with great interest the General Management Plan Draft with regard to Gettysburg.

It has taken some time for me to digest the propositions set forth therein, but after reflection, I agree that ALTERNATIVE C, the Park's proposal, would be the nearest to the ideal for the future management of the Park and its environs.

I look forward to hearing that this alternative has been adopted for use. Please advise if further comment is necessary.

Very truly yours,

Ann Irving

Ann Irving

## Ann Irving

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>lets move forward on the General management plan of Gettysburg! Thanks<br>Sincerely,<br>Name Thor IVERSON<br>Address | Thor Iverson |

**Dear Dr. Latschar,**

IT IS IMPORTANT THAT THE GENERAL MANAGEMENT PLAN MOVE FORWARD - DO THE BEST YOU CAN - I APPRECIATE THE OPPORTUNITY TO BE HEARD

Sincerely, Richard Janiszewski

Name RICHARD JANISZEWSKI

Address

**Richard Janiszewski**

## COMMENTS

14 October 1998

Dr. John Latschar, Superintendent
Gettysburg NMP
Gettysburg, PA 17325

Dear Dr. Latschar,

Our "Adopt-A-Position" group visited the Gettysburg NMP to perform our semi-annual cleanup on the North Carolina Monument and the new Longstreet Monument sites. Upon each visit I notice continued improvements to the condition and appearance of this hallowed ground and I commend you and your fine staff on the jobs you are doing.

As a novice historian, and TAX PAYING citizen, I appreciate the results accomplished by the NPS on what I understand to be a "shoe-string" budget. Furthermore, I wholeheartedly back the new General Management Plan as proposed by the NPS for Gettysburg NMP.

For visitors to the Gettysburg Battlefield to fully understand what took place on July 1-3, 1863, they must be able to see the landscape as the boys in blue and gray saw it. Any discrepancy in landmarks (such as forests and fields) being where they should be, only hinders the historical interpretation on the three day battle. It is my understanding that the new General Management Plan addresses this concern and I am 110% behind this effort.

My other concern is the lack of space and adequate facilities to display and preserve artifacts from the 1863 period. The items that are displayed at the Visitors Center

## RESPONSES

**Bill Johnson**

Museum are a treat, but one has to wonder what a full display of all the items owned by Gettysburg NMP would look like! If a display of all items could be accomplished, I would dare to estimate a 25% increase in visitors over the next several years. People will come from all over the world to see such a display.

I must definitely support the plans for the new Visitors Center: Cyclorama as has been proposed. This state of the art facility would allow display of many more artifacts and guarantee they would be preserved for future generations to enjoy. The effect of time on these artifacts could be arrested. Our generation owes all future generations the ability to view history and Americana as we have been able to view it. Anything less would be a crime.

As a tax paying citizen, I appreciate the efforts that have gone into planning this facility with the consumer in mind. As I understand the proposal, this entire facility can be built without being an extra burden on our taxes or on the limited budget of the NPS. This facility will be self-supporting, pay for itself, make a profit, and ease the NPS budget burden at Gettysburg, and protect our artifacts. This is a GREAT proposal that should be started today! The first shovel of earth should have already been turned! I heartily challenge any and all antagonists of this proposal to offer a comparable solution.

If there is anything I can do to assist you in furthering the success of the General Management Plan or the new Visitors Center please call on me. I have witnessed firsthand the improvements at Gettysburg NMP over the last few years and can foresee grand improvements with the implementation of the two proposals mentioned.

Regards,
Bill Johnson

## COMMENTS

September 25, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar:

Although it is not easy to understand the General Management Plan (GMP) for the Gettysburg National Military Park, we have learned that this plan would have serious consequences for the woodlands of the Gettysburg area. Most of the public discussion has centered on the Visitor Center controversy. We are interested in the trees.

It is our understanding that there are four alternatives in the GMP, and that the park service favors Alternative C. It is clear that what the park service does NOT support is Alternative A, which is described as a "do-nothing" approach which will "result in continued deterioration of the park's natural and historic resources."

We were distressed to see that all the other alternatives are based on the premise that the park lands should be returned to the way the landscape appeared in 1863, in so far as is possible.

Alternative C calls for the removal of 576 acres of woodlands from a total of 1,974 acres. This would eviscerate more than one-fourth of the total wooded area of the park lands, and in our opinion, would greatly diminish the beauty and environment of the wonderful national park that Congress set aside in commemoration of this historic battle.

a We have been told that restoring the landscape to its 1863 condition removing 576 acres of woodlands would result in a better experience for visitors and tourists. The GMP says that the "thick undergrowth makes it difficult for visitors today to interpret the tactical situations facing the combatants...." Have residents and visitors to the park been complaining about the trees? Where is the evidence?

Even if cutting down the trees gave a better view of the civil war battle tactics, is this more important than protecting the living environment including the ecosystems of the birds and wildlife that rely on these woodlands? Your plan addresses the legal requirement of an environmental impact statement, and claims that grasslands are better than woodlands for some species. While that may be true, common sense tells us that removing almost 600 acres of trees will cause erosion and the destruction of habitat for a vast number of species – a negative impact on as much as 30% of the park's species according to your own plan.

## RESPONSES

### Elaine and Bill Jones

a NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the GMP, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

b Is it not "selective logic" when the park service describes "restoring the landscape," but plans to remove the trees, but not the towers, the monuments, the paved roads, and the electric power lines?

In our judgement, saying that visitors cannot understand and interpret the battle of 1863 without removing the trees that have grown since then, is like saying that visitors to Japan cannot appreciate the devastation of Hiroshima without keeping the city like it was at the end of World War II.

It is quite possible to appreciate the significance of the Gettysburg Civil War battles on such lofty concerns as eliminating slavery and preserving the Union without focusing on getting a better view of how the Union and Confederate troops maneuvered.

Please revise your plan and keep the trees.

Elaine and Bill Jones



b Major landscape rehabilitation at Gettysburg would be dependent upon completion of two major historic studies: a cultural landscape report (CLR) and a National Historic Landmark (NHL) Nomination. These studies document and assess the history, development, significance, context, and integrity of the park's landscape, particularly in relation to the history and significance of the site itself. Initial drafts of both of these documents have been underway since 1995 and are the basis for the recommendations and mapping included in the draft GMP/EIS.

The NHL nomination identifies three unique but interwoven landscapes at Gettysburg that contribute to the park's national significance. These landscapes include the 1863 battlefield itself, the Soldiers' National Cemetery, and the park's post-battle commemorative system. The NHL nomination also lists those built and natural resources that contribute to the significance of the park and each of its three significant landscapes. Resources that do not contribute to the park are also described, and these generally include structures or landscape changes that occurred after the period of significance. Noncontributing resources (such as the non-historic woodlands that are cited in the draft GMP/EIS) sometimes obscure key terrain, avenues of approach, and fields of fire that affected the outcome of the 1863 battle. As a result, some portions of the battlefield have not only physically changed in appearance but have ceased contributing in any significant way to visitor understanding of this particularly important battle landscape. Modern utility systems are not contributing features within the Gettysburg park. Even under the "No Action" alternative (the 1982 General Management Plan) NPS has been removing the overhead power and telephone lines from its historic landscapes. Other post-battle resources such as the observation towers, avenues, and monuments are not proposed for removal because they contribute to the nationally significant commemorative park landscape and are therefore important to preserve and rehabilitate.

## COMMENTS

**Dear Dr. Latschar,**

As an member of the FWPG and a Veteran, I would like to see the maximum effort possible to preserve & upgrade the park & its facilities. Thank you for your efforts.

Sincerely,

Name James D. Jones

Address

## RESPONSES

**James D. Jones**

UNLV

October 13, 1995

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latchar

I understand that there has been a great deal of discussion and debate about the GMP for the Gettysburg National Military park.

I also understand that the National Park Service and the department of Interior often have to make decisions that draw the opposition of local people in order to best serve the interests of the nation as a whole

I wholeheartedly support the policy of putting the interests of the nation first. But in the case of GMP for the military park, the plan as currently envisioned is not in our national interest at all.

It's my understanding that there are several separable parts of the plan. One involved the building of a new visitors center. I take no issue with that part of the plan. A different part of the plan involves the removal of nearly 600 acres of woodland. This is the part of the plan that I find very short sighted. The Park service appears to have good motives -- they hope to make the park look more like it did in 1863 to help tourists better under-stand the activities of the Civil War battle. Nevertheless, undergoing such a destructive renovation would be ill advised, as there is very little to gain and very much to lose.

1. Why there is little to gain from the tree removal.

a The reasons that there would be very little to gain by destroying six hundred acres of woodland are very straightforward. With the land made to look more like it did in 1863, tourists would have a somewhat easier



## Todd Jones

a NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the GMP, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

## COMMENTS

time visualizing what the battle must have looked like then. But the park service and the town of Gettysburg, with its museums, shops, and reenactments ALREADY do a terrific job of making history come to life there. Very few visitors leave Gettysburg without vivid haunting images of what the battle of Gettysburg must have been like, and of its importance in our nation's history. The images they return home with might be MARGINALLY different if the battlefield was returned to its 1863 look. But most people are aware of what economists call the law of diminishing marginal returns. We know it's not worth it to spend the extra resources putting on a third coat of paint on a wall when two does the job. What's more, the proposed change could invariably make only a VERY minor difference in enabling people to more accurately imagine what the area looked like at the time of the battle. No matter how many trees the park service removes, tourists will still see a place covered with monuments, power lines, and paved roads covered with other binocular-toting tourists. It can never be possible to have any tourist site look EXACTLY as it did at before the time tourists began arriving. The park service is proposing to do something very costly which could not possibly deliver a much more improved historical vision than is already imparted to Gettysburg's visitors.

2. Why there would be much to lose in the tree removal.

In this case the marginal improvements in tourists' understanding also would come at a great cost. The financial cost alone is quite burdensome. The cost to taxpayers to remove the trees alone has been estimated at $2,695,680. Other costs are less tangible. Removing the trees would cause
b a huge amount of suffering and harm to the birds and animals living in the current ecosystem. And few can doubt that the destruction of miles of wooded hiking paths would rob the battlefield of some of the tranquility and solace that is part of what draws people here. A national park like the one at Gettysburg is not only a place for teaching history but also a place people come to for contemplation and renewal.

But ironically, what might be most tragically destroyed in destroying the trees of the battlefield is peoples' understanding and imagining of history itself. Our nation was once covered with vast woodlands. I would never have grown up with a sense of how native American inhabitants lived off the land, hunting deer and harvesting nuts and wild plants, had I not spent so many hours wandering the Gettysburg battlefield's forests, as a

## RESPONSES

b Best management practices would be applied to all sites to minimize the impact of tree removal on the park's wildlife and its other resources. In some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. This would have minimal impact on most species because most of the wooded area would be retained. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available to open those areas and maintain them, the corridors would be enlarged until the area is fully restored. Cutting during the winter when the ground is frozen would reduce soil erosion and sedimentation in the streams while also not affecting species during their breeding seasons. Seeding and the planting of native plants as soon as possible after the cutting would also reduce erosion, help prevent the establishment of non-native species, and create additional habitat for many wildlife species. All these practices would minimize the impact to wildlife.

child. I also remember how every Thanksgiving I was filled with a vivid sense of how the pilgrims must have viewed America -- a somewhat wild and foreboding place, but one that was lush, fertile, and filled with potential. America's woodlands were originally roamed by all manner of trappers, hunters, and pioneers who shaped our collective imagination. These people marveled at how different this place was from old Europe, whose forests had been cut down a thousand years before and where people lived lives much more settled and predicable. The less forest land we have, the less people will understand the conditions our country was born in.

And it is not only the memories of our earlier history that will be damaged, in order to make the history of the late 1800's more vivid. Treasured memories of our more recent history would be damaged as well. Gettysburg is not only a place where there was a very important Civil war battle. Since 1863, generations of us have grown up with this place as our home. The forests of the battlefield are covered with private monuments from our personal histories -- places where we lost teeth in snowball fights, places where we nearly succeeded in coaxing deer to eat from our hands, places where we experienced first kisses with our sweethearts. These places so important to the autobiographical histories of the people of Gettysburg would be bulldozed and destroyed forever if the current GMP plan is approved. Some of us think that the destruction of these woodlands, places of tranquility, places where animals dwell, places that bring early American history alive, and places that are full of special memories for local citizens, is too much to pay for a marginal increase in the accuracies of tourists' imaginations of 1863.

Please revise the GMP in a way that would save our trees.

Sincerely,

Dr. Todd Jones
Assistant Professor of Philosophy

| COMMENTS | RESPONSES |
| --- | --- |
| Jenny Kasper<br><br>September 27, 1998<br><br>Dear Mr. Latschar,<br>I would like to comment on the General Management Plan and the proposed new Visitor Center and Museum.<br>I find it absolutely appalling that our federal government has chosen not fund our National Parks. In the case of Gettysburg I feel our heritage has been abandoned by our government<br>I have written many letters and made many phone calls on the Parks behalf. I hope and pray that things will change in the future. That you will get adequate funding<br>But, I also feel the waiting game has gone on too long.<br>I absolutely support your management plan and the new Visitor Center and Museum project. I think the time is now to preserve and restore. I feel we don't have the luxury of waiting any longer. I think we have to realize | **Jenny Kasper** |

there is a point of no return here.
I know the plan has its critics, but I feel it would benefit all to have a park that is true to its history and a pleasant visitors experience.
I applaud you and your staff for taking on such a large job. I thank you for all your time and effort to save Gettysburg for all of us.

Yours truly,
Jenny Kasper

## COMMENTS

Author: Michael Katz
Date: 10/17/98 6:25 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: exsec@ios.doi.gov at NP--INTERNET
Subject: Comments on Gettysburg GMP
---------- Message Contents -----

To: Superintendent John Latschar,
Gettysburg National Military Park

Re: Comments on Gettysburg General Management Plan/
Environmental Impact Statement (GMP)

Dear Superintendent Latschar and colleagues,

a After reviewing elements of the GMP, I must urge the Park Service to remove plans for a privately-built and -operated visitor center that would contain for-profit concessions.

I hope that you will give careful consideration to warnings from Senators James Jeffords and Robert Torricelli -- and from a long list of Civil War preservation groups -- that such development would insert an undesirably commercial element into one of our nation's most hallowed historical sites. I have often had the privilege of immersing myself in Pennsylvania's rich historical landscape, and I do not look forward to returning to find "McGettysburg."

I also hope you will bear in mind the unfortunate precedent that such onsite commercial development would set for other national parks.

I very much hope that Gettysburg can achieve its educational, preservation/stewardship, and general management objectives without allowing this proposed private commercial intrusion into the Park.

Thank you very much for considering these comments. Please accept my best wishes for moving this process forward in a way that will satisfy all constituencies and honor Gettysburg's heritage.

Sincerely yours,

Michael Katz

cc: The Hon. Bruce Babbitt, Secretary of the Interior

## RESPONSES

### Michael Katz

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

## Yvonne M. Keafer

September 24, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

*RE: Plans for Development*

Dear Mr. Latschar:

Before it is too late to turn back, I want to express my strong disapproval of plans to develop Gettysburg. I am not even a Civil War "buff", yet I consider Gettysburg sacred ground. Can there not be one place left that is untouched by over-development?

The impact of Gettsyburg is directly connected to walking the battlefields and allowing one's imagination to hear and see history. I worry greatly that the solitude and sanctity of this special place will be lost to future generations forever.

Please, reconsider.

Sincerely,

Yvonne M. Keafer

YMK/

COMMENTS

October 19, 1998

Dr. J. Larschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325 REF: New General Mgmt Plan for Gettysburg National Military Park

Dear Doctor:

Regarding the above subject, I am generally in support of the Plan as I understand it:

- expand the interpretive themes of the Park.
- restore major portions to their historic condition ( even if trees must be cut ).
- handle major construction via a public-private partnership.

Over the years, I've visited Gettysburg personally many times as well as having taken many visitors to our Silver Spring home through it; some were repeats.

Regarding the addition of a movie? They are effective if they give a quick, 8 or 10 minute overview. I should hope that such an expense would be covered by a wealthy donor(s) or Foundation(s). Have you tried the AT&T Foundation for an assist?

Keep up the good work.

Very truly yours,

M. G. Keeler, Jr.

Maxwell G. Keeler, Jr.

WWII, Society of the Cincinnati, AT&T Retired..

RESPONSES

**Maxwell Keeler, Jr.**

Dear Dr. Latschar,

Please expedite movement on the General Management Plan for the Gettysburg National Military Park. There are many of us very interested in this important plan for the park

Thanx

Sincerely,

Name Letha Kempor

Address

Letha Kempor

## COMMENTS

Author: "Seven Springs Tree Farm"
Date: 10/12/98 1:06 PM
Priority: Normal
TO: GETT Superintendent at N2-GETT
Subject: Draft of August 1998 General Management Plan & Environmental
---------- Message Contents ----------

Dr Latschar,

Additional and revision of my October 3rd comments are here with submitted.

Alex Kessel

DATE: Octob 7th, 1998

TO: John Latschar, Superintendent
Gettysburg National Park
97 Tanytown Road
Gettysburg, PA 17325

FROM: Alex M. Kessel

Page 1

## RESPONSES

### Alex M. Kessel

~MF1503.wps

SUBJECT: General Management Plan, Gettysburg National Military Park Pennsylvania.

Please accept my apology, clarification and revision of my c omments of October 3rd 1998.

I apology for acting in haste. My zeal to express my views publicly concerning the traffic problems, desire to establish a pos itive working relationship between GNP and the local community and the time constraints, caused mo to peruse the plan too rapidly .

Franklin Township is on your distribution list. My staff didn't realize the drafts importance and failed to inform me that we had received a copy. Thank you for the 2nd copy your pleasant secret ary gave me in your cramped offices.

The Forward of the plan is well done. Your historians a s taffs who conceived it deserve high praise. I note that much of i t adds credence to my argument of October 3rd concerning the need fo r preservation of the road complex through Gettysburg and to the ne ed of a Route 30 by-pass.

For clarification, in my opinion a traffic lo op needs to be established around Gettysburg . The scenic boltway th at I envision would in some parts be a simple two lane structure, r eserved for local and tourist
traffic. In others, it should include part of the already existing R oute 15 by-pass east and southeast of town, and part of the new Route 30 by-pass. Perhaps parts of Herrs Ridge Road,. Black Horse Tavern Road, Pumping Station Road, Etc.(you get my drift) could be restructu red to become tourist moving arteries. Improvements to these Historic ally sensitive Roads should keep them two lane with perhaps (paid) sce nic easements along the right of ways. Interestingly (I may have miss ed this in the GNP draft) I've never seen a study/report on how many ti mes a tourist visiting Gettysburg rotates around town to find informa tion, parking, etc.??
Again I favor the 1960 era Buttterfield Farm Plan.

Plan D tears down the National Tower, and rebuilds to wers? I favor retaining the National Tower. Your draft plan talks a bout historical experience, and education of future generations. Fro m the ground there is no better way to get an overview of the battlefie ld than from that tower.

Page 2

## COMMENTS

~MEI503.wps

In my closing summary of October 3rd I stated that I thought the plan was sound, that was a mistake, after closer scrutiny I no longer think so.

a I have grave concerns about the mixing of private & public funds? The "Gettysburg National Battlefield Foundation" getting funds for construction and operation via fundraising? What happens if construction costs exceed funds raised, who foots the interest bill for monies borrowed?

b Destruction of 1015 acres of woods, at a cost of $4,750,200? You really stirred up a hornets nest there. Did we forget that timber can be sold for $$$?

On page 21 in the "Climate Change" paragraph, a statement is made about not anticipating an increase in visitation? Yet there will be a need for an additional 29 GNP staff members if plan D is implemented?

To much, to much? back to the drawing boards please.

Page 3

## RESPONSES

a The draft GMP/EIS states (p. 98) that construction may not start until all funds have been secured. The Gettysburg National Battlefield Museum Foundation would bear complete responsibility for any construction cost overruns.

b The cost estimates for tree removal are high because of the care the NPS would take to minimize the impacts to the park resources and the environment. The park would use best management practices and would phase large projects in order to reduce the effects of cutting. In addition, the type and quantity of trees to be cut has yet to be determined. Therefore, no value for those trees can be estimated. Consequently, the cost estimates for tree removal are calculated with a standard fee on a per acre basis. As implementation plans are developed, the costs could be reduced though the use of partnerships, cooperative agreements, or the use of volunteers.

Author: LKibler
Date: 10/12/98 9:07 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: comment on draft general mgmt. plan GNMP
---------- Message Contents ----------

As frequent visitors to Gettysburg, we have come to love the area and it's history. We have been members of Friends of Nat'l. Park @ Gettysburg for the past few years and give what funds we can to help preserve the pristeen beauty and culture of the battlefield.

We have read through the proposal and have the following thoughts;

1. We would like to see a truck route around the city ( probably North of town ) so that the huge 18 wheelers don't have to lumber through the center of town at all hours. This is an aesthetic as well as a safety issue.Mostly this would affect Route 30. We always stay at the Gettysburg Hotel right down town and we know what an invasion these trucks are!

2. NO to alternatives A,B and C.....the more you do to PRESERVE the battlefield and its environs as they were in 1863, the better! So that means we like Alternative D with the following exceptions.

a a. We do not want to see a campground as part of the visitor center area.Please keep this area as historical as possible. There are plenty of areas around town in commercial and rural areas for that sort of thing.....

b b. Please do not do a craft store within the visitor center. Why not make artisans a part of the town itself!!. The old Woolworth building on Baltimore Street as well as the old pharmacy on York Street have been empty for awhile and frankly are eyesores! Why not purchase those and set them up as "1863 like" commercial endeavors....Partial funds,if not most, can go toward the park, and it helps keep walking trade alive and well within the city.

3. Will you set up as it's done in Williamsburg,Va.? That is a great template for the future of Gettysburg ! Within the park, allow the visitor to experience a "step back in time" as mentioned in the alternative.

c 4. Please set up a minimum distance for modern day commerce to locate. It's sad to see fast food places within sight distance of the area of Pickett's charge.

5.Please preserve and protect those species which are endangered.

6.We are more than willing to pay an entrance fee into the visitor's center as well as to see the electric ( or will it become digital? ) map and the Cyclorama

Thank you very much for the opportunity to comment on the proposed plans. we love our history!

Sincerely,
Samuel and Lisa Kibler

## Samuel and Lisa Kibler

a Organized youth groups use the Youth Group Campground at no charge. It serves as a base of operations for visiting the park and learning about the Battle of Gettysburg. The preferred alternative proposes relocation of the Campground to a site that is located outside the Major Battle Action Resource Area but closer to the museum complex and key sites related to 2nd and 3rd days action than the current campground. NPS considers that this not only would remove a non-historic intrusion from a Major Battle Action Resource Area but would also facilitate a more meaningful visit by the youth groups. This location also provides improved access from two major road corridors, Taneytown Road and State Route 97. The draft GMP/EIS states that the site would be natural in appearance, managed to preserve historic features and it would be screened from the new museum complex.

b No crafts store is planned for the museum complex. A book and museum store, operated by the park's cooperating association, is included in the complex. This store would sell books, museum reproductions and other sales items approved by NPS in accordance with Director's Order 32, Cooperating Associations.

c Like the commentors, NPS believes it is in the best interests of the park's resources to limit additional roadside development on the Baltimore Pike and Taneytown Road gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 *Land Protection Plan* (LPP). The language in the draft GMP/EIS regarding the protection of Baltimore Pike has been strengthened. NPS would work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to protect these corridors.

The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed new visitor center. This use would be removed and the land would remain open if any of the draft GMP/EIS action alternatives are implemented. NPS would continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the museum complex remains residentially zoned. This issue is discussed on pages 100-105 of the draft GMP/EIS.

## COMMENTS

**Dear Dr. Latschar,**

I respectfully urge that forward progress be maintained regarding the GMP. We members of ENPG appreciate your consideration of our views and applaud your efforts to protect and enhance the solemn ground that is GNMP.

Sincerely,

Name JAMES A. KILGORE, JR.

Address

## RESPONSES

**James A. Kilgore, Jr.**

Author: Jean King
Date: 10/15/98 7:13 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg
---------- Message Contents ----------
Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dr. Latschar,
I first visited Gettysburg with my family while I was in elementary school. It is a very impressive area and should be preserved as closely as possible to its 1860's state.
a Please support the preferred alternative to improvements to Gettysburg Park except for the movie theater which is very expensive and not in keeping with the atmosphere of the park.
Thank you.
Jean King





## Jean King

a NPS has identified three interpretive venues as necessary to meet its interpretive mission, including the theater. NPS' assessment indicates that it would be feasible to include the theater as a part of the proposed museum. The park currently has a theater/auditorium that is inadequate to meet visitor needs. The new facility would also provide a theater sized to work efficiently.

## COMMENTS

Author: Kirkwood, Ward
Date: 10/2/98 8:50 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: New Visitor Center
---------- Message Contents ----------

Dear Superintendent Latschar,

I am writing to you today to express my concerns for the proposed new Visitor's Center and Museum. Clearly there is a need for a new center and museum. However, the site and the configuration must be limited so as to not intrude on the most important and sacred artifact that we have - the battlefield itself

a As long as preeminent Civil War / Gettysburg historians have reviewed the site location and have agreed that it would be the least intrusive then I will support the location. The building must not be any larger than

b absolutely necessary. Cafeterias and theaters are out of the question.

We must not forget the mistakes previously made in approvals and building on the battlefield. The destruction of woods and the battlefield at the location site of the Cyclorama Building was clearly a mistake. The approval for the construction of the Tower was another incredible mistake. The destruction of the Railroad Cut just a few years ago is another example of ill-advised decisions.

c The new Visitor's Center and Museum must be strongly linked to the removal of the Cyclorama and the Tower and the restoration of those sites to their 1863 appearance. Unfortunately they can never be the same again. Unless these links are there I can not support this proposal.

Please make every prudent move in this direction.

Respectfully yours,

Ward G. Kirkwood

## RESPONSES

### Ward G. Kirkwood

a Through study of its landscapes and its history, NPS has prioritized the park's resources according to significance. Resources that contribute to the significance of the park's battle and commemorative landscapes would be preserved, restored, or rehabilitated. As part of this effort, it is NPS' goal to remove and relocate the major visitor services facilities from their present locations, within and immediately adjacent to the Major Battle Action Resource Area of the battlefield. Removal from these sites, where they adversely impact critically important historic landscapes, to a less significant part of the battlefield would enable NPS to rehabilitate resources and landscape features that materially affected the outcome of the battle. Every effort would be made during siting and construction of the proposed new facility to protect all contributing and significant historic or archeological resources, including historic views and fields of fire that affected the progress of the battle. Construction of the museum complex at the proposed site should likewise not materially affect traffic patterns or congestion in the area, since the facility would be located in the same general area as the current Visitor and Cyclorama Centers.

b NPS has identified three interpretive venues as necessary to meet its interpretive mission, including the theater. NPS considers that the theater and limited food service proposed in the facility are necessary and appropriate facilities for visitors. The park currently has a theater/auditorium that is inadequate to meet visitor needs. The new facility would provide a theater sized to work efficiently.

c It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, the removal of the National Tower has been added to the final GMP/EIS.

## Robert A. Kise

AUGUST 12, 1998

DR. JOHN LATSCHAR, SUPT.
GNMP
97 TANEYTOWN RD.
GETTYSBURG, PA 17325

Dear Sir:
I support the Gettysburg National Military Park's Draft General Management Plan summary alternative "C," dated June 17, 1998. I would like to see this project move forward as soon as possible.

Sincerely,

Robert A. Kise

ROBERT A. KISE

## COMMENTS

Ruth Klement

Dr. John A. Latschar
Superintendent, Gettysburg
National Military Park
97 Taneytown Road
Gettysburg, PA 17325

October 14, 1998

Dr. Latschar:

I am writing to you in regard to the proposed General Management Plan and associated Environmental Impact Statement for Gettysburg National Military Park. After reading through the draft document, various articles in the Civil War News, the Friend's of the National Parks at Gettysburg newsletter, as well as, several correspondences, articles, and transcripts of testimony from members of the subcommittee from the Department of the Interior on the internet, I feel that this is an extremely important and sensitive issue that must be addressed and commented on immediately.

The mission and purpose of the Gettysburg National Military Park is to preserve, protect, and restore all of its history, the landscape, the buildings, artifacts, archives, and battle sites for all to see, experience, and learn from, now and into the future. This preservation project must be able to move forward in order to continue to educate all who wish to learn about this the largest and most costly battle fought on American soil. The GNPS battlefield must always strive to be a place where all can come to commemorate and honor those who fought for what they believed in, freedom, and a way of life.

It is my feeling that in order to achieve this goal and direct it into the future important changes must be implemented. Change is frequently perceived with a watchful and often skeptical eye. However, in regard to the Gettysburg National Military Park change is a paramount issue. The challenges facing the GNPS are overwhelming and must be addressed now. Funding must also be made available in order to achieve the restoration and preservation which is essential. Funding as in every facet of our lives, is often limited and not always available when and where we need it. Alternative funding methods have become a major format in many arenas to expedite the desired objectives. Alternative funding has proven to be very successful for all involved when properly implemented and regulated.

As a frequent visitor and volunteer worker (with the NC-SCV Camp Lee, and the Longstreet Memorial Fund) at GNP, I strongly support the concept and

## RESPONSES

Ruth Klement

2.

benefits of a **public and private partnership.** This combination has proven to be very successful, and is evident in such organizations as the Friend's of the National Parks at Gettysburg, and the Longstreet Memorial Fund. A public-private partnership would allow the GNPS to build a **new Visitors Center and Museum facility**, and **restore the battlefield site where the present structure stands to it's original 1863 appearance.**

I strongly urge that the proposal for a new Visitors Center be **approved** and that the project be permitted to begin. Our history and heritage cannot continue to exist under the present conditions. It is time for a positive move forward in order to preserve and protect our legacy for the future.

Sincerely,

Ruth Klement

Ruth Klement

## COMMENTS

Dear Superintendent John Katschan,

I am writing to you to let you know of my opinion on the horse trails at Gettysburg National Military Park. I have enjoyed these trails since the early 90's. I go to Gettysburg about 3 times a year. My friends and I really enjoyed the history & beautiful trails. We make a whole day of enjoying Gettysburg. We arrive early in the morning & ride for about 3-4 hours. We always stop at the Wagon Wheel Restaurant. The owners have a place for us to tie our horses up, they enjoy seeing the horses & we help there ~~business~~ business by buying food. When ~~y~~ we get back to the trailers we always drive into town & stop at ~~the~~ one of the many wonderful restaurants, again bringing money into the Gettysburg business area. Over the last several years I've heard many things such as the Rangers hate the horses being ridden here. They are doing their best to keep us out, we are destroying trails & etc. I know that the Pennsylvania Game Lands have closed many parks & that has started the ball rolling, it's like the domino affect – When one closes, then another one closes & so on – right down the line. And it will spill right into Maryland. Actually it has started already.

## RESPONSES

**Angela Klinger**

I must say, I have to laugh, they try to keep horses out of parks because of trail ~~erosion~~ erosion, but yet when I ride through the parks I'm constantly dodging glass bottles + cans, other trash like appliances, household trash like old furniture, tires ~~[illegible]~~ + the graffitti written on large rocks + trees. I am hoping you can help the equestrian users so we still can enjoy the beautiful parks.

Thank you,
Angela Klinger

## COMMENTS

Dear Dr. Latschar,

THANK YOU FOR COMING OUT TO PITTSBURGH TO DISCUSS THE GMP. I VISITED GETTYSBURG IN JUNE AND JOINED THE FNPG IN JULY. I WILL DO ALL I CAN TO HELP MOVE ALT. "D" FORWARD.

Sincerely,

Name CHARLES KNUPSKY JR

Address

## RESPONSES

Charles Knupsky, Jr.

**Dear Dr. Latschar,**

I would just like to ask that you help us all move forward on the Gettysburg museum project.

Sincerely,

Name James N. Kocur

Address

James N. Kocur

## COMMENTS

Author: "Tom Kolarich"
Date: 10/6/98 6:42 PM
TO: GETT Public Affairs Office at NP-GBTT
Subject: Funding for changes
---------- Message Contents -------

I received the planning material you've been distributing and I appreciate the work that's been put into it. I agree with the recommended direction for the plan.

a My concern is for the lack of firm funding for the improvements and I have to ask a simple question -- Has there been any sort of effort to enlist corporate sponsors to help with the funding? Seems to me there would be a wonderful opportunity here for corporate and government America to work together for an excellent cause!

I'm just your average Joe but I'd be happy to write to Bill Gates, Micheal Eisner, Ted Turner with an appeal for funds. Has there been an organized attempt to interest corporations to the cause?

## RESPONSES

### Tom Kolarich

a The NPS welcomes donations from both individuals and corporations for preservation of park resources, and would continue to do so as the final plan is implemented. For example, in 1998 Columbia Gas donated $65,000 for the restoration of the Eternal Peace Light Memorial. As part of the fund-raising for the proposed new museum complex, the Gettysburg National Battlefield Museum Foundation would seek appropriate funding assistance from corporations.

September 20, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent Latschar:

I can appreciate what you are trying to do in the 1998 General Management Plan, especially in regard to the public-private relationship that could result in a new visitor center complex. If that relationship were to be implemented, it would be a "coup" that would, unfortunately, really be a model for the future. I have reservations about entrepreneurs doing the taxpayers work. I generally believe that if the taxpayers, as represented by Congress, do not provide appropriations necessary to interpret our historic resources then perhaps we should make do with what we have. I truly believe that superintendents should manage their parks and that funding, including finding funds from private enterprise, should be the responsibility of Congress not superintendents. There used to be a saying: "If Congress did not appropriate the money for a project, then they do not want that project." Budget deficits led to a change in Congressional responsibility for the parks and a strong push for privatization resulted. I strongly believe that this new course is not in the best interest of the American people and need not be followed in this day of budget surpluses.

As to specifics:

a 1. The plan is full of discussion about restoring the historic scene, yet there are only two, almost hidden, references to the National Tower. In my opinion, the plan should fairly shriek regarding the intrusiveness of that tower! Who cares how far away one can see the Cyclorama Center when the Tower seems to be of no concern. The Land Protection Plan refers to the Tower, but the demise of the Tower should, in my judgment, be the top priority in the GMP.

b 2. The recent legislation giving Gettysburg National Military Park a revised boundary makes it clear in Sec. 6 that the park shall be the place to interpret the Civil War for the public. The park's interpretive role was significantly expanded to include the causes and effects of the Civil War. Starting with the Mission Goal 2 on page 7, there is little or no attention paid to the interpretation of the causes (this word should be singular since there was only one cause) of the Civil War. The GMP should be thoroughly reviewed to assure that the park's legislative mandate is fulfilled in the interpretive programs.

Page 14, Sec. 1.6.2, for example, mentions neither the cause nor the effect of the Civil War as a deficiency in the park's interpretive program. Because of the new legislation this deficiency should be corrected.





## Daniel R. Kuehn

a It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site."

b A major objective of the draft GMP/EIS is to expand NPS' ability to discuss and explore meaningfully those causes of the Civil War through ranger programs and exhibits within the new museum complex. The foundation is set upon Section 1.3, Park Purpose Statements: "To provide opportunities for people to learn about the Battle of Gettysburg in the full social, political and cultural context of the Civil War and American history (p. 5). This is also addressed in Section 1.4 Significance: "The history represented by the park is expressed in six major themes: (A.) The Civil War was the result of decades of increasing divisiveness that pulled the nation apart economically, socially, politically, and spiritually." (p. 6)

The plan also lays the groundwork for the park's themes, which are also addressed in Section 1.62: "The GMP will set interpretive goals, develop revised themes, and consider various ways to meet visitors' educational and interpretive needs, while protecting resource damage." (p. 14) One of the interpretive goals is a broadening discussion of the causes of the war and setting of the Gettysburg Campaign. Setting the stage, so to speak, must be accomplished at the initial point of contact which in most cases, is the visitor center. The museum is prescribed as the location for these exhibits under Section 2.7.2 Interpretation and Visitor Experience as prescriptions common to all actions: "The museum... would be free to all visitors and encourage them to visit and learn from its exhibits. Context for the story of the battle would include the events, people, opinions and attitudes that hardened and divided the United States and led to the Civil War. It would review the military, social and political actions that led the two great armies to Gettysburg in July 1863." (p. 88) Of the alternatives, C is the most desirable for meeting the goals of that prescription in providing for an expanded museum. Under Alternative C, Section 2.9.2 Interpretation and Visitor Experience, "The new Visitor Center, museum, and collections storage facility... would include a comprehensive overview of the

## COMMENTS

The entire GMP should be reviewed to assure that the legislative mandate regarding interpretation is met.

c 3. The description of problems with the Cyclorama Center on page 17 is flawed in my opinion. The comments about "poor functional design," "many unusual and untested architectural features," and "not designed to work well over many years and with heavy use" should be justified with facts. In fact, Richard Neutra, the designer, believed the building would be his Lincoln Memorial and would, in Neutra's own words, "last forever." "It is a building that is built for the future, to endure forever. It will long stand on a cherished site. It is a building for eternity because it has deeper character than any of the finest ancient buildings in the world." (The quotes are from the park's Determination of Eligibility for the Cyclorama Center submitted to the Keeper of the National Register last year.) Obviously, Neutra thought it was designed for the ages so it seems a bit presumptuous to say that the building was not designed to work over many years.

d Based upon my personal knowledge of the building, the Cyclorama Center has not functioned properly mechanically because of lack of money, which results in deferred maintenance, not because of poor design.

c (cont.) The Cyclorama Center may be architecturally significant and, therefore, the NPS should not be hasty about its removal, but should go to great lengths to determine whether it is worthy of preservation. On page 88 the Service plans to broadly consult with experts in Civil War history to develop interpretive themes. I believe the Service should also broadly consult with experts to determine the Center's significance.

e Page 13 addresses the problems with the cyclorama painting itself. The GMP does not indicate whether or not proper humidity controls could be installed in the Cyclorama Center. It also does not address whether or not the painting could be hung properly in the existing building, only that it is not now properly hung.

All of the justifications (intrusive location, improper conditions for the painting, maintenance problems, staff dislike, etc.) for the removal of the Cyclorama Center are irrelevant if the building is determined to be architecturally significant. If it is not significant then I would not object to its razing.

4. I disagree with the statement on page 12 to the effect that the monuments and equestrian statues are "key elements" that help visitors understand the course of the battle. On the contrary, these monuments and statues, even though they may be historic in themselves, prevent restoration of the 1863 scene and retard visitor understanding. They are as intrusive as the Cyclorama Center in that regard. Granted that they cannot and should not be removed, but their value to an understanding of the battle should not be inflated.

b (cont.) 5. Page 53. Under "Interpretation and Visitor Experience" there should be something

## RESPONSES

battle, its causes and consequences. Because more of the park would be understandable, tours, programs and other aspects of interpretation could be expanded and diversified." (p. 129)

c The design problems of the Cyclorama Building were described on pages 17-18 of the draft GMP/EIS. In short, the building is plagued with an inoperable exterior wall, uneven settling, structural cracks, roof leaks, inadequate heating, cooling, plumbing and humidity control systems, and ramps, handrails and egress that do not meet either handicap accessibility or fire safety codes. Finally, the cyclorama gallery itself is not large enough for the proper hanging and preservation of the cyclorama painting.

On September 24, 1998, the Keeper of the National Register determined that the Cyclorama Building was eligible to the National Register of Historic Places. This determination overturned the 1966 finding of the NPS and the Pennsylvania State Historic Preservation Officer (SHPO) that the building was not eligible to the National Register.

Section 106 of the National Historic Preservation Act requires a Federal agency to "take into account" the effects of its actions on properties included in or eligible to the National Register of Historic Places, and to afford the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment on the action before it is implemented. Consequently, the NPS immediately entered into consultations with the SHPO and the ACHP, in accordance with the ACHP's regulations (36 CFR Part 800), to consider the effects of the preferred alternative upon the Cyclorama Building. On May 14, 1998, the ACHP announced it support of the draft GMP/EIS proposed treatment for the Cyclorama Center. NPS would consult with the ACHP and the SHPO to develop appropriate mitigation policies with regard to the removal of the Cyclorama Center.

d Since 1974, and in addition to routine annual maintenance, NPS has corrected or repaired a variety of problems with the Cyclorama Building. Examples of these projects include the repair/replacement of the office wing, auditorium and rotunda roofs, the installation of insulation in the rotunda, asbestos encapsulation in sprayed acoustical ceilings throughout the building, repair/replacement of the air conditioning and heating systems, installation of

regarding the cause of the Civil War as mandated by recent legislation. There are several other places where the same could be said. I will not mention them all.

f 6. Page 97. In the discussion of the new visitor center to be built, managed, and operated by the Foundation I see no mention of NPS contact with visitors. What happened to the gray and green of the National Park Service? Except for external grounds maintenance the uniformed employee is missing. Is this the new trend for the NPS? The grounds maintenance could also be contracted out so why the distinction?

The National Park Service has for years fought off the pressure to privatize the management and operation of visitor services. This plan effectively defeats those efforts. It sets a whole new trend for the future because the same program could be adapted for use virtually everywhere in the National Park System. This arrangement is one more step down the road to privatization of the parks.

With this plan there is a fee for the film, a fee for the electric map, a fee for the cyclorama, an Eastern National bookstore, and a concession run cafeteria. The operating program will be developed by the Foundation and the facility will be managed and operated by the Foundation. The NPS, it seems, will be snug in its administrative offices supposedly approving everything. Why not do away with the administrative offices and have everything approved in the Washington Office? That way the Service would not have to pay maintenance costs for their part of the building. Surely curatorial services could be contracted out as could archival management. Historians would not be necessary because any research could be contracted out to university scholars. I see no need for an NPS presence with this plan!

When the plan for the visitor center is analyzed it becomes clear that the Foundation is not necessary to accomplish the plan's goals. The park "Friends" organization could raise the same funds the Foundation can, the land could be leased to buy after 20 years or purchased and donated by the Friends, and with good politics and a Federal budget surplus the other $12 million could be appropriated, and I believe would be, if the Friends group were successful. Increased operating costs would not be necessary because under the GMP the Service is paying these costs anyway. Profits from the electric map, the film, and the cyclorama would be kept by the park as would the concession fee from the restaurant. The park would do its own operating plan and the public would once again see the old gray and green. The Service would be beholden to nobody except the public!

g 7. The Environmental Impact sections of the plan do not assess adequately the negative economic impact upon many businesses that would result from plan implementation. I have heard that the Borough of Gettysburg opposes the plan. I would like to know why. Is it because these negative impacts are severe? A plan rejected by the Borough probably should not be implemented.

h 8. Page 279. The plan proposes an increase of 24 new full-time equivalents. What would these people do? It states that more interpretive services would be provided. I



humidity controls and installation of a wheelchair lift. The flagstone plazas and sidewalks were eventually replaced with concrete after the continual heaving of the flagstones became a tripping hazard and snow removal became extremely difficult. Despite annual maintenance and many additional repairs and corrections, the building's mechanical and life safety systems are still below NPS standards.

e A humidity control system was included in the Cyclorama Building as part of its original construction. However, it does not operate dependably or properly due to excessive moisture penetration of the building, caused by uneven settling of the building and cracks in the foundation. The cost to replace and upgrade the humidity control system would be infeasible without correction of the moisture penetration problems (which would require rebuilding the foundations). The painting cannot be hung properly in the existing building because the present cylindrical Cyclorama exhibit area is too small to accommodate the painting when returned to its original parabolic shape and to allow for maintenance and ongoing preservation of the painting.

f Interpretive programs and visitor informational services would continue to be provided to the public, as in the past, by a combination of uniformed NPS, cooperating association, and/or Museum Foundation staff, and volunteers.

g NPS evaluated the impact of the proposed visitor facilities and other changes suggested in the draft GMP/EIS alternatives on the local tourist economy. The analysis found that there would be positive impacts on local businesses. Although NPS estimated that more dollars would be captured by the proposed facilities than are captured in the existing visitor center facilities, local businesses located outside of the park boundaries would also benefit. For example, in Alternative C, although in-park expenditures would rise from $3,233,775 in 1996 to $8,730,700 in 2007, out-of-park or community expenditures would also rise, from $112,850,385 in 1996 to $137,129,000, or 21.5%, in 2007. In other words, Alternative C would generate almost $30 million dollars in additional visitor expenditures, and a little more than $24 million dollars of that would go to local commercial businesses outside of the park's boundaries.

## COMMENTS

did not see reference to what additional services would be provided.

i 9. Nowhere in the Environmental Impact section was there a discussion about the impact on the future of the National Park Service that may be caused by the possible trend setting nature of the plan for the new visitor center. Furthermore, there was no

j discussion of the impact upon the park if the agreement with the Foundation is not fulfilled in its entirety.

10. An index to the GMP document would have been extremely helpful.

I found nothing objectionable about other parts of the plan and I do not disagree with the description of park needs, but I do strongly disagree with the intent to privatize the proposed visitor center and the intent to destroy the Cyclorama Center without prior outside expert consultation.

In the past, the National Park Service was concerned with quality to the point that it would never relinquish visitor center management and operation in a major park to an outside entity. The plan for the visitor center gives up that hands-on control. I think every employee in the Service should read the plan for the new visitor center so they can be made aware that they are expendable. This plan was devised by minds that were without concern for the long-term implications for the Service. If the National Park Service approves the visitor center plan in this GMP then I can only say that it has suffered so long from inadequate appropriations that the agency has lost its self respect!

Sincerely,

Daniel R. Kuehn

P.S. As you know, I am a former superintendent of Gettysburg National Military Park.

cc: Director, National Park Service
Regional Director, Northeast Region, National Park Service
Roberta Platt, Member, Advisory Commission, Gettysburg National Military Park

## RESPONSES

h In Alternative D, the alternative that would require 24 additional FTE, the additional staff would be used to expand interpretive services, provide for improved preservation, curation and care of the park's collections and archives, provide maintenance required to manage the park's resources, and other purposes.

i NPS is considering a variety of partnership options for meeting the needs of individual parks throughout the system. Each potential partnership differs in terms of the type of partners, agreements, location, fund-raising strategies and other important considerations. Because each park has its own, specific requirements, and each partnership is unique, NPS does not believe that there is a need for a programmatic or service-wide environmental impact statement for visitor center or museum partnerships.

j The draft GMP/EIS states (p. 98) that construction of the proposed museum complex would not begin until all funds have been secured. The Letter of Intent (Appendix 6, pp. 326-329) provides NPS with safeguards to ensure that the park and its interests are protected in the case that the Foundation fails to adhere to the agreement.

Dr John Latschar, Superintendent October 26, 1998
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa. 17325

Dear Dr. Latschar;

I am a member of National Parks and Conservation Association and I endorse & support their position on a management plan for the Gettysburg National Military Park.

Sincerely

Michael C. Kulczycki

**Michael C. Kulczycki**

## COMMENTS

SUBJECT: Public response to the Draft General Management Plan (GMP) and Environmental Impact Statement (EIS)

FROM: Barry E. Kunkel

TO: Superintendent, Gettysburg National Military Park, zip code 17325

Fact.

GMP presents only one legitimate alternative for managing the GNMP for the next 15-20 years.

Discussion.

The superintendent suggested that from a distance this GMP looks smooth and that is a fair assessment. From out in space the earth looks smooth and without signs of life and that is a fair assessment. A piece of finely sanded wood looks smooth to the naked eye from a distance, when examined closely it shows a roughness, and under a microscope it looks so rough that it could be described as chaotic. It seems to be more a matter of how close you look at something as to how smooth or rough it appears. Up close and personal zip code 17325's GMP looks rough and flawed.

This does not mean to imply the Draft GMP is too rough to be of any use, quite the contrary, it is the smoothest rough draft I've ever seen. Why all one would need do to make this a finished product would be is delete the word Draft, center GMP&EIS, center National Military Park, and put zip code 17325 on its cover page and declare it finished. It is so smooth it already appears to be a done deal.

a Is it not appropriate procedure when creating a long range plan to form a committee that is diverse enough to address most concerns in the formation stages? The tremendous local pressures being heard seems to indicate this important planning diversity might have been overlooked as does your list of preparers and planners, page 298. This does not mean it is too late to fix some oversights because the one legitimate alternative certainly would be part of a document that provides guidance for [redacted]ntendents for years to come. However, to tie the future of park management to just [redacted] alternative seems careless, in part because of the many unknowns of future budgets, visitation figures, local support, a score of other chance figures, and the requirement to be in compliance with planning guidances, namely EIS guidance.

If one would read this document without the objectives being mentioned, that is using reverse weaponeering, one would think the goal of the plan was to build a museum and maintain the park around that building. The GMP does include alternative A, a required "no action" statement to be included in all such planning documents, but since this is more a statement on previous mismanagement, I discount it as a true alternative. No fortune 500 business would enter the next 20 years with one plan of action and I do not think it wise for a national park to do so either

## RESPONSES

### Barry E. Kunkel

a As summarized in Chapter 5, "Consultation and Coordination," NPS conducted an extensive and open scoping and public involvement program during the planning process between March 1995 and the publication of the draft GMP/EIS in August 1998. Representatives of local governments, as well as local agencies, community groups and individuals were invited to, and participated in, these public involvement opportunities. The comments received during these meetings influenced the alternatives presented in both the 1996 DCP for the visitor center/museum proposal, and the draft GMP/EIS.

b Even if the primary objective of this park is to focus on a museum, one would think it good business and military practice to have multiple approaches as to how to address that objective, not just one previously determined location and size. For example: under budget limits appropriate repairs and remodeling to the present building might be included as an alternative, another alternative could be to rebuild on present site using public or private monies, another could be a new building on a different site, and your alternative C could be another. In otherwords, provide park leaders with a flexible instrument which would allow for wiser decisions in the face of changing times and monies.

You seem good at what you do and it is time for a new forward looking plan at Gettysburg, but this letter is written to express serious concern that my piece of this park is to be managed by one very limited experimental alternative, the establishment of a private museum. The museum along with a mix of budgetary niceties have been placed in the GMP as complete and separate alternatives when in fact they mirror one highly biased approach to managing a large, complex park.

c The tree cuts and farm redesigns are useful but they are a bit late. I believe them to be a missing part of a previous plan which is now in litigation, the deer kill plan. And as such seem to be supporting previous decisions not even mentioned in this GMP, so they are irrelevant to this plan or the previous action, if still ongoing, ought be included in this plan as carried-over actions to be considered by future leaders.

Recommendations

It is recommended the GMP be rejected in its present form and be redone developing a wider, more diverse set of alternatives.

Words such as ; "should", "would", and "will" of pages iii - vi, seem too subjective for such a futuristic document because they leave little room for unpredictable possibilities. In the rewrite, it is recommended these words be softened to reflect the realism of unpredictability

The open-endedness of the future also dictates a wider selection of alternatives so that if something totally unforeseen from the present view point causes major changes to or even cancellation of the "Kingsley" proposal there would be other options planned. As it stands, if such a change would occur it would force park leaders into alternative A which has already been declared a "mismanagement" option or force them to go through this planning procedure again under less desirable conditions than you have at this moment.

Therefore, it is highly recommended that the unpredictability of the future be considered as a real possibility and that the GMP as it stands be rejected and redone to include a selection of reasonable yet different alternatives. It is specifically recommended that the "Kingsley" foundation proposal be limited to one alternative which could be the alternative of preference and be given more options of execution

b The draft GMP/EIS presents management prescriptions for preservation and use of all park resources. The proposed museum complex is one of the many prescriptions proposed. In April 1996, NPS released for public review a draft Development Concept Plan/Environmental Assessment that discussed four alternatives to meet curatorial and visitor needs, including the alternatives suggested.

c The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the draft GMP/EIS are the same as those approved in 1995. The objective is to maintain the density of white-tailed at Gettysburg National Military Park and Eisenhower National Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/ Environmental Impact Statement (FWDMP/EIS) and GMP would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a lawsuit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white tailed deer management program was reinstituted at the park 14 days later. The plaintiffs have appealed this ruling and the matter is currently pending.

| COMMENTS | RESPONSES |
| --- | --- |
| under a single heading. This would probably ease the overall concerns of some of the citizenry and maybe save this GMP process from future accusations of "mismanagement."<br><br>Sincerely involved and present,<br>[illegible] | |

# COMMENTS

Cindy Lagace

Dr. John Latschar, Supt
Gettysburg National Military Park
97 Taneytown Rd
Gettysburg, PA 17325

Dr Mr Latschar,

I truly value the educational experience you are striving to preserve at Gettysburg. As a member of NPCA I want to support the proposed alternative, yet I wonder if the plan is

a "too much". I'm concerned with bookstores, cafeterias, movie theaters, etc. It sounds like as though all of these "tourist attractions | money making opportunities could take away from the "greatest symbol for National unity" - Gettysburg battlefield.

b I've seen Mt Rushmore's view completely obstructed by the building of a snack shop | book store type building. I've seen Yosemite completely overbuilt, the rim of the Grand Canyon overbuilt with hotels, restaurants, etc. Can's visitors enjoy the natural beauty of these designated areas and buy their books, snacks, etc. in town?

Just a concerned citizen looking for an explanation. Thank you for your time and concern.

Sincerely,
Cindy Lagace
Cindy Lagace

# RESPONSES

## Cinda Lagace

**a** The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

**b** NPS has considered views from significant interpreted points in the park. The proposed museum complex would not obstruct important views.

## COMMENTS

*David A. Langbart*

October 1, 1998

Superintendent John Latschar
Gettysburg NMP
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent Latschar:

Than you for sending me the Draft General Management Plan and Environmental Impact Statement for review. I found the report, well-written, interesting, and informative.

In general, I support the Park's proposed adoption of Proposal C. The following are thoughts and concerns that came to mind as a read the draft and should be taken into consideration.

1. I appreciate the desire to recreate the battlefield as it was in 1863 through the re-establishment of lanes, rebuilding of fences and walls, removal of then non-existent woodlands, and the replanting of missing woodlands and orchards. Such activity will add immeasurably to visitor understanding of battle action. I am concerned,
a however, that this could be carried too far and might lead to future-year costs in terms of maintenance that will not be supportable.

b 2. The plan to reconstruct the pipe-rail fence to delimit the commemorative landscape will be a hideous intrusion on the battlefield. With that one action, you risk undoing all that you will accomplish with the recreation of the 1863 battle scene. This comment is based upon review of the photographs submitted by the Gettysburg National Military Park commission with its annual reports. The Park must resolve the internal contradiction inherent in the plan to recreate the 1863 battle scene and to recrate the commemorative landscape. You cannot largely recreate both. At some point, one has to give way to the other and I believe recreation of the 1863 battle scene, without, of course, removal of existing commemorative structures (monuments,

## RESPONSES

### David A. Langbart

a A GMP gives guidance in the form of management prescriptions for use by park managers, but does not elaborate on details of potential actions. Therefore, the costs provided in the appendices are indicative of the costs of implementing the alternatives, but are not definitive. Costs were calculated using NPS Class C cost estimates and are based on unit costs for similar construction. Additional staff requirements were calculated by estimating the time needed to accomplish the actions suggested by each prescription.

b The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed where needed to serve park resource protection and management needs. NPS believes that restoration of an historic commemorative feature for these purposes would be preferable to introducing a new modern design element into the Battlefield Commemorative Resource Area of the park.

markers, etc.), is more important than recreation of the commemorative landscape. There should be no reconstruction of commemorative structures, such as the pipe-rail fence, that intrude on the view-scape of the battlefield.

3. The draft GMP makes clear that one of the problems faced by the Park is the lack of jurisdiction over areas authorized for inclusion in the Park, but not actually owned by the Government. Without specifically looking for that information, visitors have no real way of knowing this. Indeed, until reading the draft GMP, it was not clear to me just how much of the land within the authorized boundaries of the Park is not owned by the Government, and I am interested and concerned about such matters. Certainly one gets the impression from the map in the park brochure that all the land marked in green is Government owned. You should consider designating, with different colors on the map, the lands that are government owned, those for which the Government holds an easement, and those now privately owned but authorized for inclusion in the park. This will make clearer to the public the threats to the integrity of the park.

Thank you for the opportunity to comment on the draft GMP. I look forward to seeing the final GMP.

Sincerely,

David A. Langbart

David A. Langbart

## COMMENTS

Author: Lango at NP--INTERNET
Date: 10/13/98 8:39 PM
TO: GETT Public Affairs Office at NP-GETT
Subject: Please SAV3 the TREES!
---------- Message Contents

I do not want my tax dollars going to waste killing trees and other foolish things.

I support Alternative A ! Leave the trees & those millions of tax dollars ALONE!!!

There is already far too much waste! It must STOP NOW!

Sincerely,
Paul Lango

## RESPONSES

**Paul Lango**

## Gary A. Larrison

GARY A. LARRISON

AUGUST 19, 1998

JOHN LATSCHAR, SUPERINTENDENT

GETTYSBURG NATIONAL MILITARY PARK

97 TANEYTOWN ROAD

GETTYSBURG, PA 17325

Dear Mr. Latschar:

First let me begin by extending my thanks for the constant flow of information to me regarding the proposed changes to a place that is near and dear to me, that being the Gettysburg Battlefield. As a frequent visitor to Gettysburg, PA I am very concerned about the Gettysburg National Military Park and it's future. To get right to the point, I fully support the General Management Plan, and specifically Alternative C. I believe the park should be returned to it's 1863 condition, as it would enhance the park's experience. I believe the groves and orchards be restored, along with restoration of walls and fences significant with the battle of Gettysburg. I know as a visitor that when observing the field it is difficult to see the

## COMMENTS

landscape because of the growth of the trees and other vegetation not present in 1863. I support the move of the Cyclorama and Visitor Center to an area off the field of Pickett's Charge, and would further like to see the removal of the National Tower from the park. I know the Tower has afforded some spectacular views of the park, but in my opinion it is an eye sore, and a perfect example of development on a field that must never be developed.

a

In keeping with this line of thinking, I have an observation and a question. On page 87 of the Draft General Management Plan and Environmental Impact Statement, there is a photograph showing Union and Confederate positions in the vicinity of the Cyclorama and Visitor Center and along what appears to be the Emmitsburg Road. From my memory, there is motel and restaurant establishments on, according to this photograph, these troop positions. My question is: Is their any effort being made to purchase or move these establishments from this portion of the battlefield? My position on this issue is to restore this field to a condition as close to exactly the way it was on July 1,2, and 3 1863.

b

## RESPONSES

a It is already NPS policy to acquire and remove the National Tower. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." The draft GMP/EIS has been revised to note this acquisition priority. However, removal of the National Tower has been added to the final GMP/EIS.

b The motel known as the Home Sweet Home Motel is inside the park boundary. Fee acquisition of this tract is designated a high priority in the park's Land Protection Plan, as amended. Chapter 2, Section 2.7.1 of the Draft GMP states that "Non-historic and non-contributing structures and intrusions are eliminated." In accordance with this management prescription, the objective would be to remove the modern structure once the property has been acquired by the Park.

Since the adjacent restaurant establishments are not within the park boundary, there is no effort being made to acquire or move them. The park has no authority to purchase properties outside the park boundary.

In closing, I want to commend the National Park Service for the job it does in protecting this and other sites I refer to as "national treasures". Once these sites are gone, they can never come back, and we must forever take sure by our support that these sites are always here for generations to come, as in the words of Joshua Lawrence Chamberlain, "to ponder and dream, and lo! the shadow of a mighty presence shall wrap them in it's bosom, and the power of the vision pass into their souls".

Sincerely:

Gary A. Larrison

## COMMENTS

Beth H. Lawrence

October 15, 1998

Hon. Bobby Etheridge
1641 Longworth Building
Washington, DC 20515-3302

Dear Congressman Etheridge:

I write to ask you to support the Gettysburg National Military Park and its General Management Plan. This plan calls for the construction of a new museum facility that does not sit on any of the actual battlefield, as the present facility does. Also, this project would increase the size of the museum and allow for the proper hanging of the Cyclorama painting, all at no cost to the taxpayer. This facility is to be funded through a cooperative effort with private business. Best of all, after twenty years, the facility becomes the property of the Park.

It is of the utmost importance to move the present facility off the scene of the third day's fighting of the battle of Gettysburg. The General Management Plan is the best way to accomplish the preservation of those resources used by Gettysburg National Military Park to teach Americans of our shared past. I appreciate you giving this project the attention and support that many others and I feel it deserves.

Thank you for your interest in the preservation of all United States history.

Sincerely yours,

Beth H. Lawrence

Beth H. Lawrence

Cc: Superintendent John Latschar, Gettysburg NMP

## RESPONSES

### Beth H. Lawrence

Jane P. Leonard

Mr. Latschar — 10-19

I support the NPCAs plan to expand, rehabilitate, construct a public/private museum on, + make more historically meaningful, Gettysburg N.M. Park. Sounds like a very good idea —

J. Leonard
NPCA member

Very ambitious, too —

## COMMENTS

Dear Dr. Latschar,

I hope that you will help move the General Management Plan forward. Again thanks for the opportunity to be heard. Keep up the good work at Gettysburg!

Sincerely,

Name Jane M. Linsky

Address

## RESPONSES

**Jane M. Linsky**

## Curt A. Livingston, Sr.

CURT A. LIVINGSTON, SR.

10/20/98

Dr. John Latschar, Supt.
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA. 17325

Dear Dr. Latschar;

This letter is to support the new management plan for the Gettysburg National Military Park as outlined in the October 1998 Park Watchers Flash (a publication of the National Parks and Conservation Association). A copy is enclosed.

The ideas and methods of funding and control would be a great benefit for the whole country. I would hope the overall plan is followed.

Sincerely,

Curt A. Livingston, Sr.

## COMMENTS

October 4, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Sir:

The letter below is a copy of one that I sent to the Gettysburg Times for publication in the Letters to the Editor section. I hope that you will take its contents into consideration before a final decision is made on a general management plan for the Park. Of the four alternatives presented, Alternative A is the only one that does not call for the large scale destruction of woodlands. That being the case, I would urge that you reconsider your decision to push for Alternative C. Instead, please continue to manage the Park as it currently is and maintain it at the highest level possible.

Thank you for your attention

Sincerely,

Nancy C. Locher

Nancy C. Locher

---

One aspect of the National Park Service's plan that has received little public attention to date is the environmental impact of their proposal. They expect to cut down 576 acres of trees and manage 278 more acres of woodlands as woodlots, which means removing the undergrowth. That is a tremendous loss of habitat for animals, birds, and plant life within the Park. In the case of birds, for example, not only will it destroy nesting areas for the species that breed here, but just as importantly, it will be a loss to birds that migrate along the Atlantic Flyway. Many birds traveling to and from Central and South America, some of which go as far as northern Canada, stop over in the woodlands of the Park to rest and replenish themselves during their long flights, both in the spring and the fall of each year. If the trees are gone and if the undergrowth is removed, these birds, many of which are already endangered or threatened species, will have no place to land. a

Lest you think I am overstating the case because the NPS says this will be only a small amount of woodland lost relative to the entire state, let me point out to you that this argument is what every developer uses who cuts down trees for houses, what every well-intentioned farmer must do in order to raise crops, and what every logger does to

## RESPONSES

### Nancy C. Locher

a The draft GMP/EIS alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that are considered in the draft GMP/EIS. The no-action alternative, in which no trees are removed, favors forest species, many of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of native shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting the habitat of any federal or state listed threatened or endangered species. In addition, best management practices would be applied to all sites to minimize the impact of tree removal on the park and its resources. This would include removing the trees in phases to minimize the effect on wildlife. It also includes cutting trees during seasons when breeding and migratory birds would not be affected.

supply our unending desire for lumber. Each parcel of woods taken alone may not amount to a great deal. Put them all together, however, and you have a tremendous loss of habitat. In the words of Kathryn S. Fuller, President of the World Wildlife Fund, "... in the age before man, the Earth lost one species every thousand years. Today we lose one every 20 minutes! Poaching and habitat destruction are driving many species to the brink of extinction." Do we really want to contribute to this? Isn't it possible for military history and nature to co-exist? Can't we count on the intelligence of the students of the battles to use their imaginations enough to preserve the woodlands? History is of such great importance for learning lessons from the past. Can't we learn from the dismal scenarios of natural history what we must protect in the present if we are to have a rich and diverse environment for the future?

Nancy C. Locher

Nancy C. Locher

## COMMENTS

**Dear Dr. Latschar,**

Thanks, John, for your leadership in the planning of the GNMP future.

Sincerely,

Name WILLIAM LONGSTREET

Address

## RESPONSES

**William Longstreet**

Dear Dr. Latschar,

Two of my Great uncles gave their lives for this Nation. Please help to move the general management plan forward. We must save this national heritage.

Sincerely,

Name Wilson H. Lotz

Address

Wilson H. Lotz

## COMMENTS

### Robert E. Lupp

4 October 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg PA 17325

Dear Superintendent Latschar:

Thank you for sending me (as a First Corps member of the FNPG) a copy of the **Draft General Management Plan and Environmental Impact Statement**.

When the Friends surveyed the membership early this year about support for the proposed visitors center, I opposed the plan for a number of reasons. As the year progressed, however, and the plans were altered, I found most of my objections to the commercialization of the plan to be eliminated. Now, having reviewed the draft GMP, I find that my major other concerns, i.e., restoration work on the field itself and some attempts to control and cut back on traffic on the battlefield roads, have been addressed.

Therefore, I am pleased to be able to tell you that I find that I can enthusiastically support Alternative C of the draft GMP.

I do have a few comments about Alternative C:

1. I just do not understand the infatuation with the concept of the Commemorative Period. To me, the commemoration is an overlay on the battlefield itself. I do not see that the design elements laid down by an earlier generation have to be venerated by us. For me the important element is the battlefield; the monuments help to locate forces but should not have an independent life of their own. Restoring Commemorative fencing would be putting a barrier between the visitor and the battlefield.

2. I applaud all efforts to reduce traffic on the field, especially by the addition of a shuttle service. I hope someday when technology allows that only electric buses will be allowed on the field.

3. Although I was intrigued by Alternative D, the fact that all restrooms would be removed from the field bothered me! Since I am now in my mid-fifties, I find that convenient restrooms are very important. Please do not close down any restrooms without replacing them!

## RESPONSES

### Robert E. Lupp

4. Finally, page 247 talks about amending the auto tour to throw an additional 150-160 vehicles onto Steinwehr Avenue and Baltimore Street at 4 p.m. and increasing congestion in town at the peak hours of 4 to 6 p.m.! Help! No! Even if the borough council requests this, please do not do it. Traffic is too heavy in town; do not add to it by directing the auto tour through town.

5. Concerning the visitors center project, although I now fully support it, I hope that the NPS has learned something about dealing with the private sector by the railroad cut disaster and does not get burned this time.

To conclude, I repeat that I now support Alternative C and the visitors center.

Sincerely,

## COMMENTS

Author: James Lutz at NP--INTERNET
Date: 8/28/98 6:25 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Draft GMP
---------- Message Contents ----------

Thank you for sending me the the Draft GMP. You and your staff have done a fine job. I know there has been some controversy about certain issues, but you have a clear vision of what the general public wants and needs at the nation's most important site. I speak as someone who has been visiting Gettysburg for 40 years. Hopefully, the modifications that the Foundation have now agreed to will satisfy outstanding concerns.

I encourage you to press on with your recommended plan. Good luck!

JAMES LUTZ

Member, Friends of the National Parks at Gettysburg
Frequent visitor

## RESPONSES

### James Lutz

## Jean Lynch

October 6, 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

I request your consideration in continuing to allow private horses to tour the battlefield under the future management plan. I have always enjoyed the experience of reflecting on the events that occurred on this ground. Doing so from horseback cannot be described—only felt. I can appreciate what our fellow Countrymen—both North and South—must have seen and felt during this important battle. I feel extremely fortunate to live so close to Gettysburg and this part of history. As I ride and feel the bond I have with my horse, I sense the bond a solider must have had with his horse who courageously carried him over this same ground.

When my friends visit me from California, we ride together. I believe they share the spirituality of this ride also for they often express their gratitude and eagerness to return.

In this rapidly changing world, it is important to hold on to something this precious for it cannot be replicated.

Thank you for your help.

Sincerely,

Jean Lynch

## COMMENTS

**Dear Dr. Latschar,**

IT'S IMPORTANT THAT THE GENERAL MANAGEMENT PLAN MOVE FORWARD

WE APPRECIATE THE OPPORTUNITY TO BE HEARD!

THANKS!

Sincerely,

Name DENNISON S. LYON

Address

## RESPONSES

**Dennison S. Lyon**

## Robert A. MacAskill

Rev. Robert A. MacAskill, D.D.

October 1, 1998

Dr. John Latscher, Superintendent
Gettysburg National Military Park
Taneytown Road
Gettysburg, Penna. 17325

Dear John:

In last Sunday's PATRIOT-NEWS there was an excellent editorial (enclosed) stating very objectively the current status of the Gettysburg National Military Park Propsal. It is a fair and accurate analysis , I think, of the current status and gives credit to you for the steadfast leadership and guidance you are giving for this Proposal. I thought you would appreciate hearing good constructive support for the overall plan.

Sincerely yours,

Bob MacAskill

Bob MacAskill
Battlefield Guide -#90
Charter Member of the Advisory Commission
Charter Member of the Friends of the National Park

Enc. Sunday, September 20th feature article - Patriot-News
Sunday, September 27th - Editorial

## COMMENTS

September 27, 1998

U. S. Secretary of the Interior
18th & "C" Streets, NW.
Washington, D.C. 20240

Dear Secretary Babbitt,

I am writing to express my opinion on the General Management Plan for the National Military Park at Gettysburg. I think this is a definite necessity to improve and preserve the military park. As a member of the Friends of National Parks at Gettysburg, I have had ample opportunity to give input on this plan and keep up on what is going on. It is my understanding that the Senate as sent this on to you as they do not approve of it. These are the same members of Congress who will not appropriate money to the National Parks for upkeep and preservation, much less improvement. The public sector is trying to take of these much needed areas. I would ask that you please support this plan. Thank you.

Sincerely,

Lohrie G. MacDonald

Lohrie G. MacDonald

## RESPONSES

**Lohrie G. MacDonald**

## Lohrie G. MacDonald

August 16, 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dr. Latschar,

I want to thank you for the support and energy that you and your staff have put into the new Visitor Center and Museum facility. I am a member of Friends of the National Park at Gettysburg. I am well aware of the tremendous amount of work that has gone into this and is still to come. It is so important to protect our heritage and history. I find *Alternative C* to be the best option for protecting and interpreting the battlefield and area. I also feel it includes and assists the local community and protects the environment. Please continue your support.

Sincerely,

Lohrie G. MacDonald

Lohrie G. MacDonald

c.c. Friends of the National Parks at Gettysburg

## COMMENTS

Dear Dr. Latschar,

Please continue to move the General Management Plan forward. Your support is greatly appreciated as well as the opportunity to be heard.

Sincerely,

Name Lohrie G. MacDonald (Lohrie G. MacDonald)

Address

## RESPONSES

Lohrie G. MacDonald

**Dear Dr. Latschar,**

As a Civil War buff and descendant of a Union
vet I can't emphasize how important it is
to move the General Management Plan forward
Thank you for listening to me

Sincerely,

Name Rosemary Maidusteck

Address

**Rosemary Maidusteck**

## COMMENTS

Sept. 4, 1998

Dr. John A. Latschar, Supt.
Gettysburg Nat'l Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Supt. Latschar:

Thank you for the Draft of the GMP and EIS for Gettysburg Nat'l Military Park.

I am so happy to hear of the improvements that, hopefully, will be made in the Park. I believe it will be a real learning experience for all to re-interpret the pattern of our field and woodlot as at the time of battle; rehabilitate the landscape features of the Civil War portion of the battlefield; to manage contemporary agricultural use to protect landscape and historic resources; to restore Zeigler's Grove and the end of the Main Line on the 3rd day of battle and to remove the Visitor Center outside of the Battlefield Perimeter Area and no construction of a new building for trails in the Park.

Alternative C due to resource preservation, cultural features, visitor experience and a positive environmental impact upon the very top

Thank you for considering my views.

Sincerely,
Mrs. Octavia Malinoski

## RESPONSES

**Octavia Malinoski**

Dear Dr. Latschar,

It is important the General Management Plan move forward.

We appreciate the opportunity to be heard!

Sincerely,

Name Kathy Malowney

Address

## Kathy Malowney

## COMMENTS

Author: Pam Martin
Date: 9/24/98 8:15 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: General Management Plan and Environmental Impact Statement f
---------- Message Contents

September 23, 1998

Dear Dr. Latschar:

I have read over the Draft of the Environmental Impact Statement for Gettysburg National Military Park and have the following questions and comments.

1. I am strongly against not taking any action as outlined in Plan A. My husband and I were at the Park in May, 1998, and I do believe steps need to be taken to preserve the park.

2. I favor Plan D because of its complete rehabilitation but wonder where the funding will come from. I did not see funding addressed in the Draft. If funding is a problem and Plan D is not feasible, I would like to see no less than Plan C accomplished.

a 3. Will funding be from private sources or public funds? If both private and public funding will be utilized, what percentage of each are expected?

The distance from Gettysburg keeps me from attending the public meetings, so I hope I will continue to be updated on the progress of this project. I feel especially close to this issue since my recently deceased father was extremely fond of the battlefield.

Thank you for your attention to my comments.

Sincerely,

Pamela G Martin

## RESPONSES

### Pamela G. Martin

a The cost estimates in Appendix 4 of the draft GMP/EIS were arranged to show which portions of each alternative would be accomplished primarily with federally appropriated funds, and which would be accomplished primarily through partnerships. In addition, the park will continue to use privately-donated funds, labor and resources to help accomplish its goals. The cost estimates in the final GMP/EIS have been reorganized to make the general funding strategy clearer. In most cases, however, exact percentages of federal vs. partnership share would not be determined until an individual project was implemented.

**Dear Dr. Latschar,**

I AM ASKING THAT YOU ENSURE THAT THE GENERAL MANAGEMENT PLAN MOVES FOWARD. I APPRECIATE THE OPPORTUNITY OF BEING HEARD

Sincerely,

Name PETE A MATIJASICK II

Address

**Pete A. Matijasick, II**

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Ms. Latschar,<br>We appreciate the opportunity to be heard, and feel it's important that the General Management Plan move forward.<br>Sincerely,<br>Rosalind McLaughlin<br>Edward McLaughlin | **Rosalind and Edward McLaughlin** |

October 28, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taney Town Road
Gettysburg, PA 17325

Dear Dr. Latschar,

a Great plans for the Park but drop the movie from the museum plans as this would reduce the cost of the project by nearly 25% and reduce financial risks.

Preserve this heroic park.

Sincerely yours,

Martha D. McMakin

## Martha D. McMakin

a The NPS recognizes both the value, and the cost-benefit ratio, of the theater as currently proposed. The NPS would consider the consolidation of interpretive venues in the museum complex during the preliminary interpretive/exhibit design phase. The goal would be to achieve the highest possible interpretive benefits at the least feasible risk.

## COMMENTS

October 5, 1998 Mary K. Mc Nabb

The Superintendent
National Military Park
Getysburg, PA 17325

Respected Sir:

I am writing to express my viewpoint as a local citizen of Gettysburg.

I am opposed to the cutting of six hundred acres of trees in and around the Gettysburg battlefield. Why not take down that huge tower?
What will happen to the birds and other wildlife that depend on the trees and brush area for the rearing of their young?

I am opposed to any privatized business efforts for the simple reason that these can be bought and sold and dishonestly doctored to fill the coffers of the rich businessman and cheapen the solemn atmosphere of the battlefield as a memorial to those who died to preserve the Union

Does the battlefield as it exists now interfere with the "dress-up" parties who come to re-enact the battles? Of course, any battlefield is stripped of its vegetation after such a fierce loss of life. Do you recall Correigidor after WW II? It was completely stripped of any vegetation So to rejuvenate the vegetation, planes flew over and dumped seed on the ground to renew the jungle growth. And growth has certainly taken place. They did not try to preserve the bombed out horror of the battles on Corregidor.

Is that what we will do with our Gettysburg National Military Park? Will we strip it of its trees and then later call for a "replanting" of those trees. That makes about as much sense as nothing

I am totally opposed to any changes in and around the park until it can be clearly enunciated.

Because of Park expansion in previous years, and with the nationalization of the battlefield, some residents lost their homes and businesses This is a disgrace but I guess the National Park Service has this power and it seems this kind of power will be exerted again. This can easily be done, you know, in a series of half-truths placed before the public and with ogvernment power.

Sincerely,

Mary K. McNabb

## RESPONSES

**Mary K. McNabb**

**Dear Dr. Latschar,**

Thanks for listening, please help the new GMP move forward.

Sincerely, Thanks

Name Ron Meyer

Address

**Ron Meyer**

## COMMENTS

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latchsar:

Thank you for the opportunity to review and comment on your General Management Plan and Environmental Impact Statement.

First of all, I would like to tell you what I think you're doing right:

You've considered a variety of options, you've come up with a plan and you're sticking to the broad objectives of the project!

I don't want to sound patronizing but you have done this in the face of unbelievable disrespect from the local ice cream and soda shop owners, the local media and people who self-promote themselves as keepers of the historic trust.

On September 9th, I attended my first (and last) public forum on this matter. NEVER in my 12 years as a member of this community and in my 25 years working with Native Americans and minorities on public health care policy have I witnessed such a uninformed and abusive display of petty self interest as I did at the Holiday Inn on Wednesday afternoon.

If I were capable of impassioned public oration, I would point out one basic reality in all this: The National Park Service has been assigned the responsibility to protect and preserve the Gettysburg National Military Parks as best they see the way.

The Battlefield at Gettysburg is a national resource and the Federal Government is the primary custodian of the resource. This is a NATIONAL Civil War site. Just as importantly, the NPS is NOT directly responsible for (or accountable to) local business profit and loss outcomes.

The fact is, sir, that ALL of the American people support this great Battlefield. This Park is not the exclusive domain of narrowly focused local merchants and officials who measure progress by what is perceived to line their pockets and interests.

Please believe that there is a great silent majority of people out there who (like myself) belong to no organized pressure group but who support the National Park Service and the conduct of its mission. This includes NPS preservation and protection of the Gettysburg National Military Park.

## RESPONSES

### Jerry Miller

As we both know, most of what the Government does is simply not subject to cost benefit analysis. Yellowstone Park? Manassas? The FDR and Vietnam Memorials? National Parks in Alaska and Hawaii? (And Teddy Roosevelt's Great White Fleet, I might add!)

Frankly, while I understand the constraints and parameters of the cooperative project, I was disappointed to see the National Park Service having to respond to petty mercantile interests in inappropriate detail.

Even though you know all this, I sense that I'm a voice in the wilderness around here and I feel compelled to express my encouragement for you to continue your efforts.

Now, (and speaking again as an unaffiliated individual), let me discuss my greatest concern with the Plan: The need to significantly curtail and restrict the privately operated vehicle (auto, RVs, bus) on the Battlefield.

According to the Plan (page 16), "the greatest amount of resource damage comes from automobiles."

While agreeing completely with the above statement, I would also suggest that the POV problem is much more extensive than the Plan suggests. As an example, the Plan infers (page 21) that increases in vehicle emissions would have negligible impacts on local air quality.

While my information is admittedly anecdotal, I think this conclusion is wrong for two reasons:

1) As someone who has spent over a decade of near daily walks on the Battlefield, I can report to you that in the summer of 1998, the local air quality in Gettysburg has been worse than I've ever seen it.

2) Assuming the air we have to start with is bad already, how in the world can the emissions from POVs carrying 1.8 million visitors NOT have a further adverse impact on the local air quality?

a

Also consider the fact that, if non-Visitor Center visitation time spent on the Battlefield is three to four hours (as cited throughout the Plan), virtually half of this time is spent in POVs with vehicles emitting gasses at either idle or very low speeds!

However, in reviewing the General Management Plan, I see more effort to accommodate the privately owned vehicle (parking, road work, signage) rather than to restricting it or eliminating it entirely.

To my way of thinking, nearly $5.0 million dollars of the Plan's projected costs can be racked up toward accommodating or protecting the very beast that is consuming and destroying the Park.

a Carbon monoxide and ozone are the two substances that are of greatest concern for automobile emissions. The Gettysburg area complies with the National Ambient Air Quality Standards and all state air quality standards for carbon monoxide. However, it does not meet those standards and is a marginal non-attainment area for ozone. Ozone pollution is not unique to the Gettysburg area, but is of concern for the entire eastern United States. To be an attainment area for ozone, a site cannot exceed the standard more than three times over a three-year period. The source of ozone in the region is from vehicle emissions along the East Coast, and from major stationary sources of nitrogen oxide emissions in the Ohio River valley. The emissions from private vehicles driving through the park are minimal compared with the larger regional emissions.

The draft GMP/EIS alternatives indirectly addresses air quality by proposing alternate transportation (some type of shuttle system) to high volume areas, such as between the proposed museum complex and the most highly visited sites (Soldiers' National Cemetery, Little Round Top, Angle, Peach Orchard, Peace Light Memorial.) This proposal is included in all three of the action alternatives (alternatives B, C, and D). Currently, the park requires all buses to shut their engines off at these highly visited sites in the park to help reduce local emissions. Because ozone pollution is more of a regional issue than a local one, NPS would continue to consult with the state and reduce auto emissions through the implementation of a shuttle system. Therefore, this issue is not evaluated further.

## COMMENTS

As a minimum, the NPS should implement a less intrusive shuttle system or, baring that, impose some kind of impact fee levied against this "greatest source of resource damage".

While I suspect that you and most of your NPS colleagues would concur in this, I also suspect that the pressure from local commercial interests will be irresistible.

However, in the meantime, I take a great deal of comfort knowing that, while it may not happen at this time in this Management Plan, I can assure you that significant curtailment of the automobile in the National Park system will be a Department of Interior or Congressionally imposed initiative in the foreseeable future.

Thank you for the opportunity to comment.

Sincerely,

Jerry Miller

Jerry Miller

## RESPONSES

10 October 1998

Mr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Mr. Latschar

This letter is in reference to the proposed General Management Plan and reflects my concerns with the proposals contained in this draft publication.

First of all let me explain that I do not own or operate any business associated with the tourist trade.

Those of us who chose to live in Gettysburg care a great deal about what happens to our town and the National Park which surrounds us Many of us are here because of our love for the history of what happened in this place in 1863.

a The theory advanced by your researchers that visitation would dramatically increase if the proposed new visitor's center were built simply does not hold water. I don't know of anyone who comes here to see the visitor's center -- they come to learn about the battle and walk over the places where it all happened And many return again and again -- it has little to do with you or your people although some of the Ranger programs are enjoyable.

Because this town is limited in size due to the fact that the Park pretty well surrounds us, and the "powers that be" don't want to see industry invade our tranquil little paradise, the local economy has become very dependent on the trade the tourists generate. It is simply a fact of life The comments made by yourself and others involved who belittle the efforts of local merchants to fight the proposed new visitor's center as being "only interested in the money to be made or the Big Macs they can sell," is unfair and a disservice to our community.

It still appalls me to think of how horribly you dealt with the white-tail population. You nor anyone else ever took into account the fact that the coyote has returned to our county and will probably wipe them out altogether In a decade one of you successors will probably come up with a grand scheme to "reintroduce the white-tail to Gettysburg National Military Park."





## Karin R. Miller

a The economic assessment completed for the draft GMP/EIS suggested that visitation would not be affected dramatically if a new visitor center and museum was built. Only modest increases in visitation by 2007 were predicted. This is discussed on page 257 of the draft GMP/EIS.

b The park is located in the Region III Air Basin and complies with the National Ambient Air Quality Standards for carbon monoxide, nitrogen dioxide, PM10, lead, and with all state air quality standards. However, it does not meet the National Standards and is a marginal non-attainment area for ozone. To be an attainment area for ozone, a site cannot exceed the standard more than three times over a three-year period. The source of ozone in the region is primarily from vehicle emissions along the East Coast, and from major stationary sources of nitrogen oxide emission in the Ohio River valley. The proposed removal of trees would have very little effect on air quality on the park because it is a larger regional problem. The green house gas that trees use the most (carbon dioxide) is not a problem in this area. In addition, the plan indirectly addresses this issue by proposing the use of shuttles to the areas with the most visitors to reduce emissions from individual automobiles. The Pennsylvania Department of Environmental Resources has concurred that actions within the park have minimal effects on regional air quality.

c NPS would not pay rent in the proposed collections storage, museum and visitor center facility. Income to repay the debt and to maintain the facility would come from the operation of interpretive venues, the bookstore and food service operation, not from the federal budget. This arrangement should allow NPS to pay for the increased costs of maintenance for the facility without using additional federal funds for this purpose from its current budget.

Of the question regarding any potential sources of gain to the Kinsley Construction, Inc., Robert Kinsley or the Kinsley family, Mr. Kinsley has provided this response. "The Kinsley proposal was to create a non-profit 501 (c) (3) foundation, the Gettysburg National Battlefield Museum Foundation, which would be the "developer" of the project. This would enable contributions to be made to the Foundation that would be tax-deductible by the donor. The Foundation will have a national board of directors comprised of representatives from the business, financial, educational and historical communities. I hope to serve on the board of directors. The board of directors will be formed after the

## COMMENTS

The idea of "returning the battlefield to it's state in 1863" is absolutely not an acceptable concept in any way, shape, or form.

b Did it ever occur to anyone that this area has grown as nature intended? The idea of cutting out any forests whatsoever is totally ridiculous. Consider the number of buses and automobiles that travel over the park each year and the emissions from their exhausts. The trees no doubt go a long way toward clearing the air of the pollution that would remain in the air if it weren't for the forests. I believe this also lessens the impact of the traffic fumes on the monuments.

c With the Department of Interior always crying about the lack of funding to maintain our national parks, how can anyone think for one moment that your scheme is justified considering the cost that would be involved in carrying out your plan? You claim that the center will be built by a private individual completely overlooks the fact that we, the taxpayers, would be renting the building at what would no doubt be an incredible amount of money per month. And the proposed developer states that "He will turn it over to the National Park Service once he has made his money, in about 20 years. By that time the place will be in need of lots of maintenance, and my question is that if we can't afford to maintain what we have here now, how in the world will we be able to afford the maintenance on the much larger center????!!!!

Mr Latschar, you will no doubt be moving on to your next assignment sometime soon, leaving Gettysburg as but a dim memory. Those of us who truly love the place will still be here, giving it our best stewardship, as we are trying to do now, and have done in the past.

d Meanwhile, may I echo the suggestion that the Park invest in some dehumidifiers to try and preserve our treasures from the past? The article in the U.S News & World Report in July revealed the shocking truth about just how grossly your people are doing their jobs. The repairs to the building should certainly have been carried out rather than spending money to obtain more land to be included within the Park boundaries. Doesn't anyone in your office have any common sense?

I trust that my letter will become part of the record as was promised at the public meeting held on 1 October at the Cyclorama.

Yours truly,

Karin R. Miller

Karin R. Miller

## RESPONSES

General Management Planning process is completed and the definitive agreement between the Park Service and the foundation is finalized. The operation of the visitor center and museum will not result in any economic benefit to me, as all net proceeds realized by the Foundation from operations will inure to the benefit of the NPS. I will also have no financial interest in any of the entities operating within the visitor center, such as the tour companies, the film theater, the food service or any book or museum store."

d The environmental storage controls within the collections storage area of the current visitor center are practically non-existent. There is neither heat nor air conditioning in the vast majority of the 6,000 square feet of storage space, which makes the temperature control for artifact preservation impossible. The entire 6,000 square feet area lacks humidity control, which makes it impossible to protect the artifacts from wide fluctuations in relative humidity. Finally, there is no air circulation system in the storage area. None of these problems can be solved in isolation. For example, the lack of temperature control is a major factor leading towards wide fluctuations in humidity. Likewise, it is impossible to provide heating and air conditioning (temperature control) without installing an air circulation system for the entire storage area. In 1988, the NPS estimated that the cost of correcting these basic environmental storage problems would be over $1.6 million (not including funds required to address any of the other storage deficiencies, such as lack of adequate storage space.)

The use of portable dehumidifiers would have a negligible effect upon these area-wide environmental deficiencies.

October 9, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Sir:

As I understand it, future plans for the Gettysburg National Military Park, what to me as a former resident of the area is the Gettysburg Battlefield, include attempting to restore the area to its original condition.

You know, as well as I, that this will require compromises all along the process. To follow such a program through to its ultimate conclusion would require such items as removal of the hundreds of monuments, which, as we know, were not there in 1863. And black-top roads would have to go, as well as observation towers, etc.

I know this is ridiculous: my point is there will have to be concessions (and I don't mean refreshment stands,) made in any plan attempting to restore the field to its original condition. To me a new visitor center and museum is a desirable proposal. However, there are other aspects of published proposals that I am violently opposed to.

a My greatest concern is for the approximately 600 acres of woods that would be cut. Will that enhance the average visitor's perception of the battle?

b And to grow 160 acres of orchards. Unless you can get some knowledgeable Mott-Musselman orchard maintenance men to care for those trees, the orchards will only blight the area rather than enhance it. Think of it: spraying and/or removing rotting fruit, etc.

c Worse yet is the rebuilding of 40 miles of fences. We're not talking wire fencing. Those original fences were made of rails--rails which I'm sure were chestnut which were easily split from chestnut tree trunks. As of today there aren't chestnut trees, so what will you use? Forty miles of worm rail fences: why, I'd come just to see such fences. Again, don't forget the maintenance!

So, put in a few fences, enought to create atmosphere, but NOT 40 miles. Just settle for five miles, OK? And the same applies for the orchard. Put in a small apple planting, but NOT 160 acres, please! And above all, please spare that 600 acres of woods; let conservation be the theme.

On the positive side, I shout "hallelujah" as I look at Figure 21 in your Draft book of August, 1998 and read Significant Features Restored: item No. 5, "National Tower Removal." This tower is a dishonor to those who fought and died on the Gettysburg Battlefield; the sooner it is removed the better.

Yours in the interest of prudent historical preservation and in commemoration of those who created that segment of history. Thank you.

Sincerely,

Walter Miller

## Walter Miller

a NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive staff are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

b NPS would not manage its orchards for fruit production. This would limit the need for use of spraying and for intense management practiced in fruit producing orchards.

NPS believes that the reintroduction of some of the fencing present at the time of the battle would help visitors understand the impacts of the action on the soldiers and non-combatants involved in the fighting. The mileage figures noted in the document are the maximum that NPS might consider reintroducing to the battlefield. Fencing would be built only when considered important to meeting NPS' interpretive goals and when it can be adequately maintained.

c When constructing fences, NPS uses the same material and construction present in the historic fence, but is not required to use the same type of wood. For example, in some cases NPS might use pressure treated posts and rails to prolong the life of the fences and decrease the frequency of maintenance. In a four-month period in 1998, a four-man crew rehabilitated over 5 miles of fencing; volunteers repaired and painted another 5 miles. Most of these fences will not have to be redone for 10+ years.

## COMMENTS

COMMITTEE TO ELECT
MOFFAT FOR CITY COUNCIL

15 October 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa. 17325.

SUBJ: NPCA support for the new general management plan for Gettysburg National Military Park.

Dear Dr. Latschar:

I am simply writing to voice my support for the subject preferred alternative for restoration of this invaluable historical asset. Naturally, I also hope that development of the interpretive movie will simply be deferred until future funding becomes available to the museum rather than dropped entirely. Good luck with these plans.

Yours truly,

John E. Moffat

## RESPONSES

**John E. Moffat**

**Dear Dr. Latschar,**

Please help the progress on the General Management Plan to move forward.

Please allow us the opportunity to be heard!

Sincerely,

Name Jackie Momener

Address

**Jackie Momener**

## COMMENTS

Dear Debbie,

I would have been in touch sooner but my PC has been in the shop for awhile. My comments are not meant as criticism - I think you have accomplished an enormous task with an impressive result. As a Park Watch volunteer I feel I have a vested interest and strongly support the Staff efforts and recommendations.

I do not expect a response other than that you have received this communication.

Some items to consider as Errata or Core agenda:

a Page V
In the penultimate para., ".natural resources are the also the same.".

b Page 12
The use of "principals" meaning individuals was intentional?

c Page 176
In the penultimate sentence of the second complete para. the sentence starts as, "One point source.". Was this intended as, "One source point."?

d Page 203
In the last para. headed Devil's Den and. in the second sentence, ".stop their vehicles stop on the road.". should it be, ". many visitors who stop their vehicles stop on the road."?

e Page 212
In the second para. under 4.2.2 Natural Resources the GIS mapping system is mentioned. I looked all through the Draft and could not find out what GIS stands for. Do the letters represent words and would it be worthwhile to give the words and then state (GIS)as is often done when initials will be used subsequently?

f Question
On page 197 in the last para. there is mention of Maryland's "light rail system". A single line of "light rail" exists connecting parts of Baltimore County, Baltimore City and Anne Arundel County. It is almost the equivalent of a high speed trolley. I have heard no plans to extend this to Frederick and would have to believe it to be not feasible either as to mode of transport or affordable in construction. Maryland does have a commuter rail system and that could be what might be planned for expansion.

General Comment
My English experts tell me 'scoping' is a slang word? It is used throughout the draft and I wondered if it is accepted as other than slang by virtue of usage in the NPS or consulting circles?

Sincerely,

Mike Monahan

## RESPONSES

### Mike Monahan

a The word "the" between "are" and "also" has been deleted in the final GMP/EIS.

b The word "principals" has been changed to "principles" in the final GMP/EIS.

c The term "point source" is correct. It is an environmental term that relates to the source of water or air pollution.

d The second "stop" has been removed from the sentence in the final GMP/EIS.

e The reference has been clarified in the final GMP/EIS. GIS means Geographic Information System. The NPS uses GIS to provide computerized mapping for its parks.

f The reference to "light rail" has been changed to "commuter rail" in the final GMP/EIS.

a Dear Dr. Latschar, AS A LONG TIME CONCERNED, MEMBER OF F.N.P.G., I FIND IT IMPOSSIBLE TO SUPPORT ANY NEW BUILDING ON OR NEAR THIS SACRED GROUND UNLESS IT IS CLEARLY DEFINED AS TO "WHAT" IT IS GOING TO LOOK LIKE. A CIVIL WAR FARM REPLICA OR A SMALL FACTORY RECONSTRUCTED ON THE ORIGINAL SITE AT TO ORIGINAL PHOTOS & PLANS? WOW! BUT, SOME SORT OF MODERN ART ABOMINATION DISASTER PLAN SHOULD BE SCRAPPED ALONG WITH THE SCRAP METAL TOWER, THE NEW AMERICAN TRASH STORE BEAUTIES LIKE WAL-MART AND GRANT AND MOST OF ALL, THE GARBAGE DECOR AT BURGER KING. THIS IS SACRED GROUND AND SACRED AMERICAN HISTORY. REQUEST WITHHELD.

Sincerely,

Name Paul Moschette

Address

## Paul Moschette

a In accordance with the Letter of Intent, the Gettysburg National Battlefield Museum Foundation would be responsible for providing a design concept for the proposed museum complex "that respect their location and the historic vernacular building tradition of the area; respond sympathetically to the natural landscape features of the site; and become a positive catalyst for preservation and a lever for sensitive development of surrounding areas." (draft GMP/EIS, p. 327)

## COMMENTS

Author: Kenneth Mott at NP--INTERNET
Date: 9/28/98 8:11 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: trees

---------- Message Contents ----------

Dear Dr. Latcher: It has come to my attention that the Park Service is contemplating the possibility of removing some 600 acres of trees from the battlefield area. I hope this won't happen for obvious ecological, environmental, and aesthetic reasons. There are plenty of "authentic" open spaces to be viewed by our tourists, and the idea of restoring ground to vintage 1863 might better be aimed at the National Tower, the honky-tonk tourist traps along Steinwehr Avenue and some other monumental eye sores which have grown up around our "hallowed ground."

Thanks for considering my very small voice in this matter.

Sincerely yours,

Kenneth F. Mott

## RESPONSES

### Kenneth F. Mott

HUGH F. MULLEN, JR.

10-15-98

Dear Mr. Tatsuko,

I attended the meeting you had in Pittsburgh on Sept 24, 1998. I was encouraged by the elimination of many of the commercial enterprises in the proposal that you are working on for a new facility.

a The location was the one problem that many people have had including myself. According to the historians who were commissioned in their March 1998 report show much activity on the Lava Front. We are again putting a facility on hallowed ground just as we did with the present facility and the

## Hugh F. Mullen, Jr.

a Through study of its landscapes and its history, NPS has prioritized the park's resources according to significance. The results of these studies have been reviewed by independent historians who generally have concurred with the park's assessments. Although there was military activity on the proposed site, that activity was primarily support or movement in nature and was not significant; therefore, the site was not included in the Major Battle Action Area of the battlefield. There were, however, important artillery positions on topography adjoining the development site that NPS would enhance through interpretation and vegetation removal. Resources, such as these artillery grounds and marked battle locations, that contribute to the significance of the park's battle and commemorative landscapes would be preserved, restored, or rehabilitated. As part of this effort, it is NPS' goal to remove and relocate the major visitor services facilities from their present locations, within and immediately adjacent to the Major Battle Action Area of the battlefield. Removal from these sites, where they adversely impact critically important historic landscapes, to a less significant part of the battlefield would enable NPS to rehabilitate resources and landscape features that materially affected the outcome of the battle. Every effort would be made during siting and construction of the proposed new facility to protect all contributing and significant historic or archeological resources, including historic views and fields of fire that affected the progress of the battle.

## COMMENTS

Gettysburg?

I applaud your efforts to protect and preserve the artifacts of the battle that were donated by the Rosenthal family. Although I see there concerns for their home and artifacts from others in the newspaper. I don't think a place anywhere where these artifacts can be kept to preserve them until a permanent place can be built.

b I hope something can be done about that obnoxious structure tower that would serve it from the battlefield somehow.

Alternative C is fine. Please keep us in touch

Sincerely,
Hugh Mueller Jr.

## RESPONSES

b It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, the removal of the National Tower has been added to the final GMP/EIS.

—

Author: "Don Mullis" at NP--INTERNET
Date: 9/27/98 12:49 AM
TO: GETT Public Affairs Office at NP-GETT
Subject: Comments about Gettysburg update look
---------- Message Contents ----------

General Management Plan,

I do not own a hores, but, I vote to kept ALL of the horse riding trails. The horse was part of the battle at Gettysburg, for both sides. The horse is painted in the Cyclorama. The horse was used to get to Gettysburg i.e. men, cannon, food, supplies, and on on. The horse is part of U.S. history, from 1776 to 1943 used by the U.S. Army. Cars and busses were not part of the battle at Gettysbury, PA. To replace the Museum and Visitor Center just to have something new, I say NO. Why, do you need to move the Museum and Visitor Center? Do not tell me because of the line the line should be part of the Museum and Visitor Center. What do the Private Funds get out of the New Museum and Visitor Center?

The above comments were from :
Don Mullis

## Don Mullis

## COMMENTS

*John A. Murphy*

Draft GMP & EIS Comments

16 October, 1998

To: Dr. John Latschar, Superintendent
Gettysburg National Military Park

From: John A. Murphy
Subject: Draft General Management Plan & Environmental Impact Statement comments
Reference: Draft GMP and EIS of August, 1998

1. SUMMARY - This paper contains comments on the proposed Gettysburg National Military Park's draft General Management Plan. The paper is presented in four sections:

- Background
- Discussion
- Conclusions & Recommendations
- One final question.

2. BACKGROUND - The draft GMP is the first such plan to be developed in 15 years. There is much in the draft plan which is impressive and reflects a strong planning effort by the Park staff. There are also major areas in the plan which I consider "flawed". My background and experience which come into play in the commentary in paragraph 3 is as follows:

- Former Vice President and Chairman of the Gettysburg Borough Council's Finance Committee
- Current Treasurer of Main Street Gettysburg Inc.
- First Chairman and Gettysburg Borough representative on the Gettysburg National Military Park's Federal Advisory Commission.
- Retired career naval officer ( Commander, U.S. Navy )
- Former Principal at Booz» Allen & Hamilton Inc. who led successful proposal team efforts in major federal competitions ( i.e. + $1M )

3. DISCUSSION - This section contains a series of "subjects" and associated questions and commentary on issue/s which relate to the GMP. The following subjects are presented:

- The Process employed
- The Need for draft GMP development
- Range of Alternatives presented
- Economic Impact of the preferred alternative
- Resource management (deer )
- Resource management ( woodlands ).

3.1 THE PROCESS - I participated in the "front end " DCP process which developed some of the broad criteria which were included in the RFP (Request for Proposals) for the new Visitor Center. My question for you is this:

a Question 1 ( GMP too specific ?) Why does the GMP contain a museum and visitor center proposal ? Is this not too specific for a General Management Plan ?

b Question 1 Commentary - . Are you not getting the " cart before the horse " ? I thought that you would present a broader range of issues and alternatives which was begun in the DCP and then fold them into the GMP as described in the National Register " 15

## RESPONSES

### John A. Murphy

a The National Parks and Recreation Act of 1978, the law that mandates GMPs for all national parks, requires that NPS indicate the types and general intensities of development. Therefore, information regarding the location and size of visitor facilities is appropriate for inclusion in GMPs.

b Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new GMP/EIS to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the GMP until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the GMP/EIS. Working with the public, NPS established goals for the GMP (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone;

*John A. Murphy* 2

Draft GMP & EIS Comments

b (cont.) May, 1998 notice of termination " of the Environmental Assessment Process for the DCP and collections storage, museum and Visitor Center facilities. I recall that the draft DCP of April 1996 had a much broader range of issues and alternatives than I see in the GMP (e.g. Cyclorama building rehabilitation ). Not only did the GMP drop issues and alternatives covered in the DCP, but it asks us to make a giant leap of faith and select a specific alternative which contains a very specific visitor center alternative. It is my understanding that a GMP should lay out broad criteria and standards as we were doing in the DCP. The selection of a specific, preferred alternative would come later. After the GMP was published. Also, I note that after searching the Internet ( which contains an exhaustive and supposedly complete listing of all Federal Register notices ) I could find no evidence of the 15 May, 1998 DCP termination. This leaves me to wonder if the original DCP was ever officially terminated prior to issuance of the GMP as stated.

3.2 THE NEED - I have attended all public meetings regarding the DCP and have repeatedly heard citizens question the need for the new facilities presented in the draft GMP's preferred Alternative C.

Question 2 - Is this major new facility really necessary ? Are the artifacts and archives really in such bad shape or are you just trying to make a worst case for new facilities ?

c Question 2 Commentary - In recent public and private meetings I have heard citizens with considerable expertise or experience in curatorial and archival matters, claim that the need expressed in the GMP is overstated. That conditions are not as bad as are claimed . That one particular flag is constantly shown by the NPS as a classic example of poor conditions. Local residents and former NPS staff residing in the Gettysburg area say that the flag being shown was in its current condition when first received. One observer recently noted that the Gettysburg museum is a " quantity " type museum which is typical of museums which evolve from private collections associated with Indian or Civil War sites.[1] That when reference is made to thousands of items that are held in storage and deteriorating, the "thousands " being referred to are mostly bullets and shell fragments of low quality and condition. That there are significant, higher quality examples of such materials on display in the museum floors above. Also, that offers of financial or programmatic assistance to the NPS have been refused or ignored That the Park is trying to let the artifacts, archives and even the Cyclorama building deteriorate so as to make a "worst case " scenario to justify newer and bigger facilities. It would seem to me, at this point, that we need an objective, unbiased determination on the expressed needs contained in the preferred alternative.

[1] This is in contrast with a "quality " museum where you have fewer artifacts,but they may have great historical significance. For example, a table that is soaked with the blood of Stonewall Jackson following surgery at the Battle of Chancellorsville.

and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

c The environmental storage conditions for the artifact and archival collections are accurately described on pp. 169-170 of the draft GMP/EIS. The NPS does not believe that the need is overstated; professional archivists and curators unanimously agree that temperature control, humidity control, dust control and fire suppression are the basic components of a stable museum storage environment.

Approximately 7% of the total collection is on display in the visitor center. The remaining 93% of the 43,000-item collection remains in the basement storage facility. The items in storage include thousands of highly significant artifacts directly associated with the Battle of Gettysburg, including a full range of arms, equipment, and clothing.

The NPS has not refused any formal offers of financial or programmatic assistance for the maintenance or preservation of the collection.

Between 1993 and 1999, the NPS spent over $703,500 in operating funds to improve storage conditions and preserve archival and curatorial collections. Work accomplished has included backlog cataloging for archival and artifact collections, completion of a Collection Management Plan and a Collection Storage Plan, rehousing of artifacts and archival materials (i.e., in acid-free storage containers), purchase of additional museum storage cabinets and shelving, expansion of the artifact storage area, upgrade of the museum storage intrusion alarm system, installation of a fire suppression system in both the storage area and exhibit area, and improvements to heating and air conditioning systems in the museum exhibit area.

## COMMENTS

*John A. Murphy* 3

Draft GMP & EIS Comments

3.3 RANGE OF ALTERNATIVES & ECONOMIC IMPACT - The GMP provides four alternatives with Alternative C expressed as the preferred alternative.

b (cont.)

Question 3 (Range of Alternatives) - Why is there no middle range of alternative/s which relate to rehabilitating and improving what you have ? Why did you restrict your alternatives to "no action " or the Kinsley proposal ?

Question 3 Commentary - Say what you will, the draft GMP really only contains two alternatives - do nothing and accept the Kinsley proposal (Alternatives B,C & D ).[2] This is like a Low alternative ( Alternative A ) and three High alternatives (B, C & D ). There is no middle alternative. To me there might be a real alternative B which would focus on fixing up what you have. That is, basically stay where you are. Fix up what you have and possibly distribute some of the curatorial and archival facilities elsewhere ... such as in sound, but abandoned buildings in the historic Borough of Gettysburg ? I believe the preferred alternative is a formula for a near-term economic crisis for the Borough of Gettysburg. See Question 4 for a more detailed discussion of what I have come to call the "Park Core " issue.

d

Question 4 ( Borough Economic Impact ) - Does the NPS understand the potential economic impact on the Borough of Gettysburg's tax base if and when it moves its Museum and Visitor Center into Cumberland Township ?

Question 4 Commentary (The Park Core Issue ) - The current commercial zone ( Ward 3.2 ) adjacent to the Park visitor center on Steinwehr Avenue and Baltimore Pike is a major tax revenue source for the Borough of Gettysburg. In the public meetings, and in the GMP itself, I noted recognition of the potential impact of Alternative C on the businesses and business owners themselves. However, there was little or no recognition of its potential impact on Borough government revenues and the low to moderate income citizen taxpayers that live in this area.[3] As a former Chairman of Borough Council's Finance Committee, I personally conducted an analysis of Borough budgets and actuals from 1974-1994. Working with the Borough Manager and Council, I led an effort to seek out new revenue sources (i.e. regionalization of services, pillow taxes etc.). We never projected the loss of a significant portion (i.e. Ward 3.2 commercial zone taxes ) of our tax base as appears possible/likely if Alternative C is adopted.[4] Also, as Main Street Gettysburg's Treasurer I have been personally, deeply involved in a five year battle to develop new attractions downtown and along the Historic Pathway. I had high hopes that respondents to

[1] At one of the first "Concerned Citizens " meetings, one citizen noted " As I see it the alternatives they are offering are "do nothing ", or Kinsley + 400 acres of trees, Kinsley + 600 acres of trees or Kinsley + 1000 acres of trees. Some choices ! "

[2] I believe this potential impact is being overlooked in current discussions. If, the Park should move its visitor center and museum into the LeVan property, then the businesses will follow. Larger corporations such as MacDonalds probably immediately. The smaller souvenir and tourist museums later.

[4] It should be noted that the Borough of Gettysburg has a weak enough tax base as it is. Local government and church facilities are exempt from taxation. This constitutes about 55% of the Borough's property. By and large, the citizens of the Borough are at or near poverty income levels. That is why we qualify for grant programs such as CDBG ( Community Development Block Grants ).

## RESPONSES

d The park's visitor centers are currently located in Cumberland Township, and would remain in Cumberland Township if they were relocated as proposed in the draft GMP/EIS. Therefore, amusement tax revenues currently collected by Cumberland Township would not be negatively affected.

*John A. Murphy* 4

Draft GMP & EIS Comments

d (cont.)

the recent NPS RFP would include some ideas that related to the Borough, but none actually appeared. Now there is a dialogue underway to try and define some potential areas of cooperation between the NPS, the Borough and Main Street, but there are no guarantees. Nothing is real. In Figure 1, I show graphically what I call the " Park Core " issue. In essence it notes that (per NPS planning guidelines ) all National Parks have a " core area ". A place that is the focal point for visitor orientation and education. A place that is broadly representative of the spirit of the place. In the case of battlefields ( per NPS Bulletin No. 40 ), a battlefield park often has its origin in a cemetery - as happened here in Gettysburg. A core area is a focal point for visitor services. It may have some unique feature of the Park, a visitor center, a museum and even special interpretive areas. In Figure 1, I note that the Gettysburg Park's core is currently made up of three major elements (in addition to key areas (e.g. The Angle ) of the Battlefield itself ): the National Cemetery, a museum (established in 1928 ) and a visitor center. [5] These facilities also are directly adjacent to a key area of the Battlefield itself - The Angle/Highwater Mark which was the culmination point of the Battle's grand assault ( Pickett's Charge ) on 3 July, 1863. [6] The three areas of the core are conveniently located adjacent to a commercial zone which developed to the west and north of the Gettysburg core over a 70 year period ( from 1928 to present ). I understand that Park Service policy also states that commercialism should be kept out of the core area of Parks whenever possible. That commercial activities should be allowed to develop in a special commercial zone alongside the fringe of the Park's core. This is exactly what we have in Gettysburg. If ... we move two of the three pieces of the Gettysburg core ( the museum and the visitor center ) away from the National Cemetery we will not only effect the visitor experience (easy ambiance flowing between the pieces of the Park's core area and the commercial district ), but also have a direct effect on the current revenue base of the Borough of Gettysburg - regardless of what might happen along the Historic Pathway and in the Lincoln square area downtown. The businesses will have the option of moving into a new commercial zone along Baltimore Pike in another local jurisdiction - Cumberland Township. In the near term ( 3 to 5 years from completion of Alternative C ) there will be a predictable drop in revenues from the Borough's Ward 3 along Steinwehr Avenue - especially in the Colt Park area which is a bedroom community for many senior citizens who live on fixed incomes. Such annuitants will be hard pressed to endure any significant increases in property taxes to compensate for the commercial zone tax revenues. Thus, preferred Alternative C appears to be a formula for an economic crisis in the Borough of Gettysburg - regardless of what, if anything, occurs

e

b (cont.)

[5] For purposes of discussion here, I consider the Cyclorama building "the visitor center ", because that is what it was initially built to be. It was a major development under NPS Mission 66 when it was completed in 1962. One of five NPS visitor centers developed nationwide under Mission 66.

[6] Some might say, " But what about the Battlefield ? Why is this not part of the core ? " To this I say - that the field of battle itself is too large... too spread out to be a core area per se. The National Cemetery becomes a " proxy " for the field of battle in that it contains the remains of Battle participants, sits in a significant area of the Battlefield ( the Angle / Highwater Mark ), and is collocated with visitor orientation/interpretation facilities ( museum, electric map, cyclorama and visitor center ). I think it fortuitous or plain "good thinking " on the part of our ancestors that they managed to collocate the major pieces of the current Gettysburg core area in easy walking distance of each other.

e The historic core area of the park is not composed of or dependent upon visitor use facilities. The historic core of the park has been identified within the draft document as that combination of unique and nationally significant resources that together make up the historic resource area. This area is composed of the contributing landscapes of the Major Battle Action Resource Area, the Soldiers' National Cemetery, and the Battlefield Commemorative Resources Area—all of which are the essence of Gettysburg National Military Park. The current Visitor and Cyclorama Centers have already sundered the historic core of the park. Relocating the visitor use facilities from their present (and relatively recent) sites adjacent to the Soldiers' Natioinal Cemetery would not adversely affect the historic core of the park. In fact, their relocation to a site outside of the Major Battle Action and Battlefield Commemorative Resources Areas would enhance this historic park core. The site proposed for the new museum complex is outside of the historic park core and therefore would fulfill NPS mission goals and planning guidelines.

## COMMENTS

*John A. Murphy* 5

Draft GMP & EIS Comments

in and along the Gettysburg Historic Pathway and in the Lincoln Square area downtown. Most of these development efforts would not " kick in " until years after the demise of the current commercial zone.

3.4 RESOURCE MANAGEMENT - I have learned that in most Park Service GMPs the main planning focus is on resource management. Within this general subject area .. the focus is on the management of flora and fauna. With this in mind I ask:

f Question 5 (Outdated Deer EIS ) - What is the basis for the statement on page 26,.. " It is not necessary to discuss ... " the deer management issue as part of the general management plan ?

Question 5 Commentary - I believe you that you are ignoring or overlooking three areas or issues which make the 1994/1995 Deer Environmental Impact Statement out of date and in need of review and updating. Actions which should take place as a part of the overall GMP process. Most of these issues are covered in detail in Enclosure 1.(deer suit ) which I cite for reference and will address only briefly here.

- NEPA EIS Variations & Violations - The methods employed in the deer kill between 1995 and 1997 varied significantly from those described in the approved 1995 EIS. As such, the program needs to be subjected to a NEPA review. The current deer suit asserts, in part, that the current deer kill program is a violation of the National Park Service Act and the agency's own internal policies.[7] The NPS Act states that the agency shall conserve the wildlife in national parks. The destruction of any wildlife is authorized only if it can be demonstrated that this wildlife is "detrimental to the use " of the park.

- NHPA Violation - The deer suit currently argues that the NPS has violated the NHPA even though it went through the motions of compliance following a court order in the summer of 1997. This is discussed in detail at p. 41 of Enclosure 1 which discusses the "adverse effect " of an activity on a historic site if it "may diminish the integrity of the property's ... setting .... feeling, or association." In making their argument, plaintiffs relied on NHPA regulations and NPS Bulletin #40 which relates to battlefields. In finding " no effect " the NPS cited another Bulletin ( # 38 on Traditional Cultural Properties ).[8] In other words, a " no effect " determination was made based on one Bulletin (#38 ) and the plaintiffs were citing another (#40). In the Motion for Summary Judgment (Enclosure 1 on p. 44 ) it is noted that this is a violation of the duties of the finding's signatory under the provisions of the NHPA.

[7] See Enclosure 7 under Argument (pgs. 31-35 ).

[8] Referenced cite is Dept. of the Interior, National Park Service letter H4217 X-N1615 of 14 November, 1997 signed by Dr. John Latschar.

## RESPONSES

f The draft GMP/EIS does not address deer management because the park already has an approved plan. In keeping with the plan, the objectives for deer management in all four alternatives of the GMP are the same as those approved in 1995. The objective is to maintain the density of white-tailed deer at Gettysburg National Military Park and Eisenhower National Historic Site at 25 deer per square mile of forest. The objectives of the deer management plan are to protect the historic battle landscape from the adverse affects of over browsing by deer. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/Environmental Impact Statement (FWDMP/EIS) and draft GMP/EIS would remain as part of the historic battle landscape.

The Record of Decision was approved for the FWDMP/EIS in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. By March of 1997, the park had reduced the density to approximately 31 deer per square mile of forest. In February of 1997, a lawsuit was filed against the park in regards to the deer management program. The park voluntarily suspended the program in July of 1997 to re-evaluate its cultural compliance documentation. The court ruled in favor of NPS on 1/26/99. In compliance with that ruling the white tailed deer management program was reinstituted at the park 14 days later. The Plaintiffs have appealed this ruling and the matter is currently pending.

*John A. Murphy* 6

Draft GMP & EIS Comments

- GMP Historic Landscape Restoration - The GMP plans to clear 100s of acres of trees and to revamp the modern agricultural scene will have a significant impact on the deer population at Gettysburg. This is discussed in detail in the Arguments section of Enclosure 1 ( p. 38 " The Park Service Failed to Conduct any Supplemental NEPA Review ). In essence, the GMP proposes to remove habitat for deer which would force them to seek new habitat outside the Park. As such, it constitutes an alternative not previously available. To claim that such a measure would have no effect and it is not necessary to discuss this issue does not make sense.

g Question 6 (Woodlands removal ) - Why is it, after 135 years of no serious effort to manage the historic woodlots and the woodlands of Gettysburg's Battlefield, the GMP would consider such extreme measures as the removal of from 400 to 1000 acres of trees ?

Question 6 Commentary - This, to me, is another example of going to extremes ( as in the deer case ) when the need addressed is vague and debatable. Why must we go from doing nothing at all for 7 generations to the wholesale removal of forested areas (i.e. flora ) or deer ( i.e. fauna ) ? Oddly enough, I raised this issue during the ACHP ( Advisory Council on Historic Preservation ) hearings in November 1997. Enclosure 2 is a paper which I submitted to the ACHP. I noted that it seemed illogical to be blaming the deer for retarding woodlot regeneration when the woodlots of today have not only a primary growth ( mature white oak etc.), but an understory, second layer of growth (e.g. dogwood, redbud and exotic species ) that should not be there. [9] When discussing this before the ACHP I presented comparison photos such as shown in Figure 2 which showed that we had many areas that were overgrown with trees that should have few if any trees if we were trying to be historically accurate. As in other areas, I now believe, it is not advisable to try and go back to 1863. As citizens have noted in recent public and private meetings... it is not even desirable. There is a " world at peace where once the gun roared " aspect to letting some areas go back to nature. I believe there is a case to be made for removing trees from some critical areas of the Battlefield. Cases in point in my mind are areas to the north of Little Round Top as shown in Figure 2 because this is an area that was traversed by the Irish Brigade on the afternoon of 2 July,1863 enroute into the Wheatfield (and death ). Also, some areas to the south of Little Round Top through which Hood's Alabamans and Texans attacked little Round Top and the 20th Maine and 140th New York as shown in Figure 3. Also, the NPS should continue to keep areas clear on the western slope of Little Round Top and over the 11th Corps's hastily erected battlements or bastion running up the eastern slope of Culp's Hill. The point is, I think we need to be moderate and most selective in where we clear wooded areas. Removal of about

[9] I believe that the NPS should be more precise in the use of terms relating to this issue. Woodlands vs. woodlots etc. .... and ... not try to play semantic games as if those of us who have been involved in this issue since 1991 don't know the difference between the various terms. We know the difference all to well and are the ones who noted the inconsistency when appearing before the ACHP. The fact is, that through the neglect of some form of woodland/woodlots management over the years... nature itself has entered into the debate and helped obscure where historic woodlot blends with non-historic woodland etc.

g Managers of the battlefield historically and in the recent past have managed woodlands to preserve their extent and appearance. The record of these efforts between 1863 and 1927 are discussed in the Forward of the draft GMP/EIS. The park's 1982 GMP included restoration of woodlots as one of its actions. Since that time, NPS has removed vegetation from key portions of the battlefield including Devil's Den, Little Round Top, the Slaughter Pen and other areas. NPS has also undertaken scientific studies and other activities to develop the base information needed to manage appropriately its historic woodlands.

| COMMENTS | RESPONSES |
|---|---|

*John A. Murphy* 7

Draft GMP & EIS Comments

100 acres of trees north and south of Little Round Top are the maximum required in my mind. That, and clearing out of the historic woodlots in key areas (not all required ) would probably be enough. It is too late for wholesale woodland removal. Rather, the NPS should put its energy into clearing out the undergrowth, second story of the historic woodlots. Also, consider cutting back a small percentage of historic woodlot trees each year - just as the farmers did in 1863. Sell the wood at reasonable rates and use the funds received to help defray Park maintenance costs. A " pay as you go " program that is good for both the Park and the local community. In areas where major clearing is done, you would simply brush hog the area twice a year as we are doing in many areas of the Park at present. This would prevent regeneration of wooded areas. This practice seems to be working very well in certain areas of the Park at present ( west of Bryan house at Ziegler's Grove and Forney's Field south of the Peace Light. Again, there is an irony here when I think of how the deer were being blamed for non- regeneration of wooded areas. The truth is, there are not enough deer in the Commonwealth of Pennsylvania to keep up with the voracious regrowth of trees and weeds in the Park.

4. CONCLUSIONS & RECOMMENDATIONS

b (cont.)

a. Process - The GMP is not a general planning document, but rather a document that is, for the most part, designed to justify a decision that was previously made. That is, to build a new Gettysburg visitor center, museum, collections storage and commercial services complex as defined in the Kinsley proposal. This violates the spirit and process defined in the National Environmental Policy Act.
Recommendation - Remove all reference to specific development proposals from the GMP.

c (cont.)

b. The Need - The NPS is attempting to establish a worst case scenario for deterioration of its collections storage. This case is questionable and should be reviewed.
Recommendation - Have the need reviewed and validated by a select panel of independent ( non-NPS ) and NPS experts in collections storage. A collaborative, professional review.

b (cont.)

c. Range of Alternatives - The GMP lacks a credible range of alternatives. New alternatives, which were in the draft DCP, should be inserted into the GMP. This would include rehabilitation and improvement of existing facilities.
Recommendation - Revise the GMP and include a "mid range " set of alternatives. Something that is somewhere between doing nothing (Alternative A ) and the preferred Kinsley proposal ( Alternative C ).

d (cont.)

d. Economic Impact ( the Park Core issue ) - Preferred alternative C is a formula for a major, near-term tax crisis in the Borough of Gettysburg.
Recommendation - Work towards a new alternative which would not fragment the existing Park core and its relationship with the existing, adjacent commercial zone. Have a Borough economic impact assessment done by an professional organization that is independent of any of the

concerned parties (i.e. NPS, local borough government, local businesses and developers )

e. Resource Management (flora ) - As with the deer program, the NPS is going to extremes when discussing removal of 100's of acres of woodlands.
Recommendation - Prepare and submit a GMP supplemental EIS which considers the relationship and effect of plans to manage the flora (i.e. woodlands ) and the fauna (i.e. deer management ).

f. Resource Management ( fauna ) - The NPS is in violation of NEPA, NHPA and NPS internal policies by its conduct in the current deer management program. Also, its failure to recognize the need to discuss deer management in the GMP in light of plans to reduce habitat ( i.e. tree clearing ) and plans to revamp/restore the historical agricultural scene - just does not make sense. [10]
Recommendation - Prepare and submit a GMP supplemental EIS which considers the relationship and effect of plans to manage the flora (i.e. woodlands ) and the fauna (i.e. deer management ).

5. ONE FINAL QUESTION - I would like to conclude my GMP commentary with one final question.

Question 7 (GMP Review Process ) - Isn't there a better way ?

Question 7 Commentary - The answer is probably not so simple as the question. The entire review process that has been going on since March of this year has been acrimonious, divisive and painful. [11] It seems that none but the Friends, the Advisory Commission and a couple of influential politicians and bureaucrats are prepared to accept the GMP as is. And yet, most know from my family's laws that "Murphy is an optimist ". I believe that we can and should try to learn some valuable lessons on how to do more effective Park - community planning . We can do this if we reflect objectively about the process that has unfolded since the 1st week of March 1998. I believe that there are ideas and concepts that emerged in the course of the 20 or so public meetings which were a surprise to many of us (e.g. Borough tax base impact of Alternative C; weaknesses in the Martin economic data etc.; was the need real ?; lack of middle alternatives ). I truly believe that if we, as a community of interdependent, concerned citizens and organizations, could interact honestly and openly ... we could do some wonderful things for the small, but historic place known as Gettysburg. In so doing we might become a useful model for other National Park

[10] It is not acceptable to maintain the GMP is an unapproved plan so there is no linkage with the deer suit. The NPS has the ability to make the current draft GMP a final GMP in a matter of 90 days or so by purely administrative decision. A decision where the public gets no further opportunity to discuss the matter.

[11] There is a certain irony in the fact that the opponents of the plan come from diverse segments of our community. Liberals and conservatives. Business owners and average citizens and taxpayers. Horse trail lovers, deer admirers, and tree hugging ecologists. Some longtime locals have noted that, in a perverse way, the GMP review has brought the community together in a common cause that they have never seen before.

Draft GMP & EIS Comments

communities. When we become isolated from each other and have limited communication, then ideas can emerge which are total surprises and lead to serious conflict. When the surprises are major then the trust level and communication becomes that much more difficult. I believe that were we to trust each other a little more and communicate more openly and honestly, we could do some wonderful things for our historic community.

I hope you find my comments constructive and useful. Please feel free to contact me at any time should you have any questions regarding this submission.

Sincerely

John A. Murphy

Copy: Advisory Commission; Gettysburg Borough Council; Main Street Gettysburg Inc. (*et al* )

Enclosures:

1.) United States District Court for the District of Columbia, Davis v. Latschar; CIV. NO. 97-232 ( Motion for Summary Judgment )

2 ) J. Murphy Memo to Advisory Council on Historic Preservation dated 10 October, 1997.

RESPONSES

COMMENTS

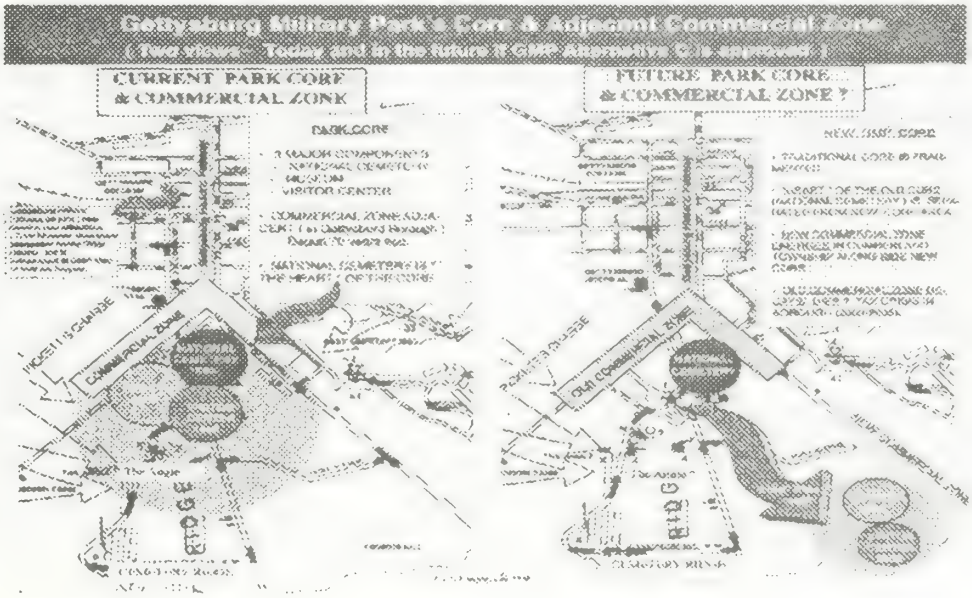



Figure 1 - GMP Core Area Graphic

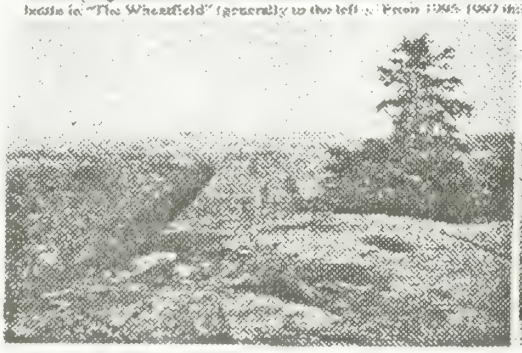
RESPONSES

COMMENTS

Gettysburg Park Management

GROWTH OF WOODED AREAS - Little Round Top facing north

Again, using a distinctive rock formation on Little Round Top can one see how wooded areas have filled in what were once open fields or lightly wooded areas. In the center of the 1863 picture one is looking towards Seminary Ridge and Cutler Hill. The open area is militarily significant because it is the area that the Irish Brigade marched through on the afternoon of July 2nd, 1863 as it proceeded into battle in "The Wheatfield" (generally to the left of Peach Orchard). From 1965-1967 this area was a major focus of NPS deer kill operations.

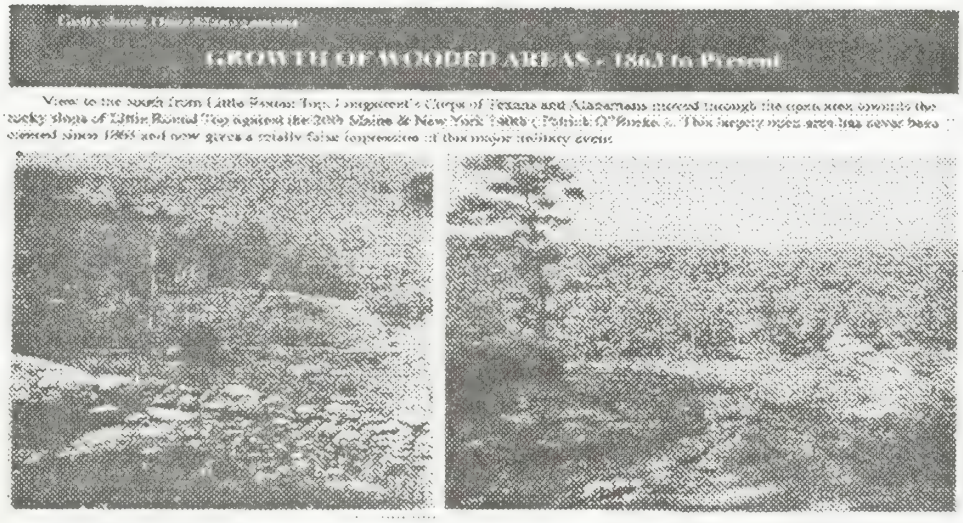


1863 VIEW - Note distinctive boulder at left. Sparse trees in the center. The trace of Wheatfield Road can be seen at center.

1998 VIEW - Note significant intrusion of woods into the center of the scene. This shows what 135 years of natural tree in-fill is like. In 1863 a combination of cattle browsing and tree cutting kept this area clear.

RESPONSES

COMMENTS



## COMMENTS

**Support "The Friends of the National Parks at Gettysburg"**

5

August 15, 1998

DR. JOHN LATSCHAR, SUPT.
GETTYSBURG NATL. MILITARY PARK
97 TANEYTOWN ROAD
GETTYSBURG, PA 17325

Dear Superintendent Latschar,

As an active member of the "Friends of the National Parks at Gettysburg" and as an American citizen let me congratulate you on all the hard work and dedication you, and your staff have put into the proposed Visitor's Center. I just wanted to let you know that I am extremely happy with the latest revised plans for the new center, and urge you and the Park Service to continue along these lines.

As you know, the "Friends" have taken an active role in this endeavor, and I stand by the Board of Director's statement of satisfaction at the pace and direction you are taking.

The time has come to "get at it" and build the center before any more Red Tape clutters up the matter. I appreciate the mailings that you have sent keeping me informed during this process and wish to continue receiving information as it becomes available.

Again, let me express my deep satisfaction with this project and offer my help in its completion in any way you might see fit in the future. Keep up the GREAT work!

Yours,

John R. Murphy
1st Corps Member, FNPG

## RESPONSES

John R. Murphy

**Dear Dr. Latschar,**

Pleas help move the General Management forward. We do Need this

Sincerely,

Name Umberto P. Mutt

Address

**Umberto P. Mutt**

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Sir;<br><br>Thank you for the G.M.P. for Gettysburg National Military Park.<br><br>I began reading it as soon as I received it and will continue to do so until I have completed it.<br><br>Thank you and your staff for the diligence and perserverance not only for your current duties but for the additional task of future labors that the final plan requires.<br><br>Sincerely yours<br>Ermin D. Narehood | **Ermin D. Narehood** |

January 18, 1999

Mr. Gerald Bennett
Gettysburg National Military Park
Advisory Commission

Dear Mr. Bennett:

I am writing to the Advisory Commission to forward my comments on the draft General Management Plan and Environmental Impact Statement (referred to as "The Plan"). I realize that the comment period has expired, however, I believe my comments can be addressed during the implementation phase which has not started. As I interpret The Plan, the trees in the Stevens Run area of the Park will be removed because trees were not in that area in July of 1863. I realize that an orchard and a nursery may be developed in that area, again to recreate the landscape that existed in 1863. My area of concern centers on the removal of trees in the Stevens Run area, and my points of concern are enumerated below.

a My first concern is regarding the need for a buffer between the battlefield tourist and the residential development that has occurred in the Stevens Run area. I believe that the battlefield experience for the tourist looking out over Pickets Charge would be enhanced if they were not treated to a clear view of the modern residential areas. I can guarantee that there is no desire from the residents to have a better view of the tourist up on Seminary Ridge. The trees that are there now provide a perfect buffer to benefit the tourists, history buffs, and local residents.

My second concern regards the need to remove the trees for historical interpretation. My review of The Plan and numerous books and other literature on the battle indicates that the area of Stevens Run where the trees presently grow was not an area of major troop movements during the battle. I realize the Bliss House is located at the end of the woods at Stevens Run, and the action that occurred at the Bliss House was quite interesting, however, I do not believe that the historical interpretation of the action that occurred there is encumbered by the present timber growth.

My third concern is more technical in nature and deals with the peak runoff from Stevens Run. Table 2 of the

## Patrick L. Naugle

a In many cases, non-historic woods that were planted or allowed to grow in order to hide modern development have obscured key terrain and fields of fire and thereby themselves detract from the 1863 appearance of the battlefield, including the area north of the Bliss House. As a result, some portions of the battlefield have not only physically changed in appearance but have ceased contributing in any significant way to visitor appreciation of these battle sites. Although some of these areas are adjacent to modern development, the increased ability to see the historic terrain and key topographic features would enhance visitor understanding of the battle and the significance of battle features that are currently obstructed by this incompatible growth. NPS would not entertain any new introduction of wooded areas to obscure development if that new vegetation would obscure significant battle topography or historic views (fields of fire).

The area of Stevens Run where the trees presently grow was a significant part of the Confederate battle line and tactics on July 2 – 4, 1863. In this area, a major portion of the Confederate attacking column (during the Pickett-Pettigrew charge) advanced under fire from Cemetery Hill. Therefore, this area was a site of major troop movement, and interpretation of this most important action is hindered by the present timber growth.

b The report entitled "Assessment of Soil and Water Impacts of the General Management Plan at the Gettysburg National Military Park" indicates that peak streamflow for alternatives B, C, D, would increase by 4%, 2%, and 1% respectively in the Steven's Run watershed (Table 2). You are correct in stating that this is a minimal increase. However, you have misunderstood the formula on page 3 of the report. The area weighted mean factors used to determine peak flows are 0.3 for agricultural areas and 0.24 (not 25%) for forested areas. These numbers are not the estimated increase in peak flow but are factors used in the formula to estimate the type of land use on the site being evaluated, e. g., agricultural, forested, meadow, hardened surface, etc. The higher the factor for the peak flow, the higher the predicated peak flow would be estimated. Thus peak flows in agriculture lands, in general, are higher than peak flows in forested lands (0.30 is greater than 0.24). There are a variety of other factors that are also involved in determining peak flows such as percent slope, and type of soil. The only factor that would be changing in the action alternatives would be the amount and type of vegetation. Trees would be removed but would be

## COMMENTS

"Assessment of Soil and Water Impacts of the General Management Plan at the Gettysburg National Military Park" indicates that the peak runoff from Stevens Run increases from 4% to 1% depending on the alternative that is implemented. This does not sound like a significant increase, however, the peak runoff formula presented on page 3 of the report indicates that removal of trees would increase runoff by 25%, which is a major difference. I
b believe the 4% to 1% increase would relate to the total runoff of Stevens Run which would be measured at the confluence with Rock Creek. If, however, the peak runoff was measured at the down stream side of the tree removal area, the increase would be closer to the 25% increase. This same area has been prone to flooding in recent years, and a 25% increase in peak runoff would pose a significant added flood risk to the residents on Howard and Ridge Avenues.

My fourth, and final, concern deals with destruction of habitat for wildlife, particularly endangered and threatened species. Section 3.2.9 of The Plan addresses this topic in a fashion that I believe is inadequate. The section states that 16 endangered or threatened plant and animal species reside/exist in GNMP, however, it does not identify the species by name. The section does state that tree clearing could be detrimental to one of the unnamed species. There is no evaluation of the total impact of tree removal on any
c of the species and there are no mitigating measures outlined. In short, although The Plan appears to be well thought out and very comprehensive in most regards, I believe it does not adequately address the habitat loss for wildlife. Some species that are not presently on the threatened or endangered lists will be negatively impacted. For example, the Audubon Society has a "watch list" that includes species that will be endangered if populations are stressed. The Red Headed Woodpecker is on both the national and Pennslvania watch lists. GNMP has a good population of Red Headed Woodpeckers, in the Stevens Run area in particular, which will be negatively impacted by tree removal.

Thank you for giving me an opportunity to comment on The Plan and I look forward to hearing from you regarding my concerns. I can be reached at 334-1142 if you have any questions.

Sincerely yours,

Patrick L. Naugle, P.E.

## RESPONSES

replaced by lower growing vegetation which accounts for the minimal differences in estimated peak flows for the different alternatives.

c As stated in the draft GMP/EIS (page 177), there are no federally listed threatened or endangered species in the park. The Pennsylvania Natural Diversity Inventory (PNDI) lists 16 state-listed species; however, they request that agencies keep this information confidential. (see Appendix 7). The PNDI asks that this information be kept confidential to protect these species, some of which might be subject to poaching or vandalism that could threaten them. Fifteen of the 16 species included on the list would not likely be significantly effect by the alternatives. Those species are generally described on pages 177 and 254 of the draft GMP/EIS. The one species that might be affected by the action alternatives, the Black Vulture, was discussed by name and in detail in Chapter 4 of the draft GMP/EIS. We have amended the language in the draft GMP/EIS to make it as clear as possible without disclosing information the PNDI considers confidential.

Before any cutting is done, site-specific floral and faunal surveys will be completed to assure the action is not affecting any federal or state listed threatened or endangered species. Through best management practices and protection of the endangered plants, NPS believes it could protect this species from degradation. Section 4.6.2 has been modified to indicate this.

The National Audubon Society (TAS) provides "WatchLists" for educational, citizen science, and habitat protection initiatives but they carry no official authority and are not meant to supplant federal or state lists of threatened, endangered, or species of special concern. While you are correct in stating that red-headed woodpeckers are on the TAS national WatchList, they are not included on the current Pennsylvania WatchList (4/28/99). According to the Atlas of Breeding Birds in Pennsylvania (Brauning 1992), red-headed woodpeckers inhabit "...wide valleys and agricultural areas. Its typical breeding habitat is an open area with scattered trees such as a farm, parklike woodland, golf course, orchard, wooded creek valley, or bottomland." All alternatives in the plan retain these landscape characteristics which should enable the park to maintain a viable population of red-headed woodpeckers.

**Harold Nelson**

Fax Transmission

TO: Dan Lutcher

FAX #: (717) 334-1891

FROM: Hal Nelson

RE: GMP

PAGES: Header + 8

DATE: Oct 16, 1998

COMMENTS: Again, thanks for your great leadership and professionalism.

The enclosed detailed comments may be of minor interest to your staff – they are an old army guy's effort to help pick the nits in a fine draft.

V/R

Hal Nelson

## Harold Nelson

**a** A restroom and parking symbol should be included on Figure 14 as indicated in the comment.

**b** This area was purchased by the NPS in 1992 because it was under threat of development at that time. This area is a contributing component of the battlefield landscape on which significant battle action occurred during the Pickett-Pettigrew charge, on the 3rd day of the battle. Deleting this tract from the boundary of the park would diminish the ability to preserve and interpret the Battlefield.

**c** Of the 17 points identified as Major Interpretive Venues in Figure 13 of the draft GMP/EIS, 13 were used to create the key viewsheds map. No land outside of the park can be seen from the other four major interpretive venues. Since the observation towers were constructed to provide visitors with views of the battlefield, it is important to understand what land can actually be seen from these locations. Therefore they have been included as interpretive observation points in the key viewsheds map.

**d** Figures 12, 18, 22 and 25 of the draft GMP/EIS show either the Commemorative Subzone (in the No Action Alternative) or Battlefield Commemorative Resource Area (in the three action alternatives). The commemorative area is a narrow corridor, so these figures do not try to show the variations in the shape of the area other than to note major memorial groups.

**e** The lower right photo on page xxiii of the draft GMP/EIS shows a portion of Hancock Avenue when the War Department Era fencing and stacked balls were still in place.

**f** At Gettysburg NMP, NPS has an excellent living history program that is supported by hundreds of volunteers from all over the United States. Those volunteers who portray Union troops prefer to hold their encampments and demonstrations on the Union lines (primarily near the Pennsylvania Monument) while those portraying Confederate troops understandably prefer to hold theirs on the Confederate lines (primarily Pitzer Woods). While the amphitheater will be moved, the recent addition of the Longstreet Monument

## COMMENTS

October 16, 1998

Dr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pa 17325

Dear Dr Latschar

Thank you for the great support you gave all members of the Advisory Commission yesterday Last night's meeting went much more smoothly than it might have. This letter with its enclosure is my personal follow-up to the Commission's letter agreed at that meeting. All of this information was passed to our chairman, and I delayed sending it to you until the commission had completed its work on the draft General Management Plan.

I fully support the concept of moving forward with Alternative C as set forth in the draft I believe that alternative will result in a better educational experience for visitors, improve the stewardship of historical resources, and help ensure that Gettysburg will remain an important destination for people studying our American heritage in the foreseeable future.

I strongly support the plan to raze the current Cyclorama and Visitor Center and return that important ground to an appearance approximating the 1863 configuration. Returning the field system and vegetation patterns in large parts of the battlefield to 1863 status will be another important contribution to battlefield interpretation. Using a public/private partnership to build and operate the new Visitor Center is appropriate, and the site chosen for that operation is workable Moving administrative support, the campground, and the amphitheater to the Fantasyland site makes sense

I am especially pleased that the new Visitor Center will provide an appropriate setting for preserving the Cyclorama painting as well as the extensive collection of artifacts and documents. The shortcomings in the current facilities housing these treasures have been tolerated too long.

I have enclosed a few detailed comments keyed to specific passages in the GMP

Sincerely yours,

Harold Nelson

## RESPONSES

at Pitzer Woods and our desire to continue to base living history out of this area led to the decision to leave the parking area in Pitzer Woods. Stone and Meredith Avenues (near Reynolds Avenue), is infrequently used for living history activities. These activities do not have negative impacts on the park resources.

g In Figure 20 of the draft GMP/EIS on page 120, the restroom north of Little Round Top is shown in error and has been deleted in the final GMP/EIS. The guide station symbol at Spangler's Spring on Figure 14 of the draft GMP/EIS on page 72 is shown in error and has been deleted in the final GMP/EIS.

h The diagram was not intended to portray an actual route, but was intended to give readers an idea of some of the places that a shuttle such as the one proposed might stop. Additional planning would be undertaken before the route of a shuttle could be determined. NPS believes that such a shuttle, when properly planned, would be feasible.

i The words, "Add 115 acres of woodland present in 1863" have been added in the final GMP/EIS.

j Wayside exhibits would remain under the recommended alternative.

k You are correct that ranger programs, in general, tend to be more focused than other tours. The more focused interpretive tours offered by rangers are an important component in helping visitors understand more specialized aspects of the stories relating to the Battle of Gettysburg. For this reason, ranger programs would take advantage of the entire battle action area so that increased opportunities for interpretation of these areas could be offered to the public.

l Although the amphitheater would be removed, there would still be parking permitted along the road. The area is well situated for living history, and some events would continue to be held here, although the primary location for living history would be near the Pennsylvania Monument.

Enclosure to H Nelson Letter dated Oct. 16, 1998--Detailed Comments on Draft GMP

a Map on page 72--Existing Conditions. Restrooms in Cemetery are not shown, Parking near Spangler's Spring is not shown

b page 81 (map on page 103) consider adding to the minor boundary adjustments the question of aligning the park/borough boundary in the vicinity of Long Lane--this was raised in our subcommittee study of the Home Sweet Home issue. The entry would read much like the first bullet in the existing text: Delete the small area of Gettysburg borough beyond the end of Long Lane. This parcel is not needed for park purposes

Page 97. Foundation Organization and Board. It is nicely described here. The acting president must be encouraged to get moving on this--the longer Kinsley speaks for this board, the more grist there is for his critics

c Map on pages 104-105--Key Viewsheds Why shift reference points from the "major interpretive venues" used on the map on page 71? I realize this rendering uses the towers and all other high points, but I can't see the importance of such information What can be seen from the most heavily used interpretive sites would seem to be more important.

d Page 109 Commemorative area-- "Visitors experience a mowed corridor that indicates the historic extent of the veteran-designed park" Somewhere in the GMP there should be a map or sketch of this commemorative area. The term is used frequently, and I think I have a pretty good idea of its meaning, but I found no definitive illustration.

e Page 113 Commemorative Area--Restoring small-scale elements in monument groups--illustrative photos or drawings to show examples of "before" and "after" would be useful

f Page 119 Alternative B--Map of Interpretation and Visitor Experience. I don't understand the reason that a living history area is retained near Reynolds Avenue when that area is identified on p. 120 as one subject to heavy visitor impact.

Why is parking and a living history area retained on West Confederate Avenue if the Amphitheater is to be moved?

g Page 120. A restroom is added north of Little Round Top. I can find no funding or justification Is this an error in the graphics?

The Information symbol that was located at Spangler's Spring in the base case is deleted Is this correct?

h The notional "Interpretive shuttle from Visitor Center" is unimpressive. Given one-way roads and distances, I think the shuttle idea will be very difficult to implement.

i Page 122. Land and Resources section: I believe that a bullet is missing: "Add 115 acres of woodland present in 1863." This element is in the budget (p.318) and is mentioned elsewhere.

m The NPS generally uses the Reynolds Avenue site for a limited number of special living history events that are related to the action that occurred on that part of the battlefield. When Reynolds Avenue becomes one way, parking would be available along the roadway. The site south of Granite Schoolhouse Road, the George Spangler Farm, was a hospital site. The NPS would use the site for living history associated with Student Education Programs and to interpret the medical aspects of the battle.

n On page 136 of the draft GMP/EIS in Figure 24, the parking lot just south of the Soldiers' National Cemetery should be shown with a regular parking symbol, not an overflow parking symbol. This correction was made in the final GMP/EIS.

o In Figure 24 of the draft GMP/EIS on page 136, the restroom north of Little Round Top is shown in error. This correction was made in the final GMP/EIS.

p The southeastern-most parking symbol in the area of Devil's Den on Figure 24 of the draft GMP/EIS is for the parking lot at Big Round Top along Confederate Avenue. This parking lot should be shown on Figure 20 of the draft GMP/EIS on page 120.

q A parking lot next to the Oak Ridge tower should be shown on Figure 24 of the draft GMP/EIS on page 136. This correction was made in the final GMP/EIS document.

r A parking lot at East Cavalry Field should be shown on Figure 24 of the draft GMP/EIS on page 137. This correction was made in the final GMP/EIS.

s The proposed auto tour would take the visitor north on Steinwehr Avenue from Hancock Avenue before ending in downtown Gettysburg.

## COMMENTS

j Page 123 (and again on p 129) Interpretation and Visitor experience--I'm not clear on what happens to wayside interpretive sites in the recommended alternative. In Alternative D (p. 141) they would be removed. I do not believe they can be replaced in any alternative since they perform such an important function orienting visitors on the terrain and on troop movements Maps and drawings placed properly on the ground are invaluable supplements to tapes and brochures. They can only be removed when every visitor has a living guide--a condition that will not be met under any planning alternative

k I'm not sure what is gained by expanding ranger tours to include the entire battle action area. One advantage that Gettysburg has over other National Military Parks is the Licensed Battlefield Guide system--those guides supplement the rangers on work of this type, making the ranger resource available for more focused and specialized work.

l Page 134-135. Why retain a living history area in Pitzer's woods when the parking area and amphitheater have been removed and there are no facilities?

m Why retain a living history site on Reynolds avenue when it's still an area of congestion? Why add a living history site south of Granite Schoolhouse Lane? This is an out-of-the-way area, but there's no discussion of this potential use anywhere in the draft GMP, and it would seem to make more sense to add a living history site near the new Visitor Center

n Page 136-137 In Alternative B, the parking south of the National Cemetery is transformed from the "Overflow" category of the baseline into a regular parking lot. That makes sense, since the big parking lots around the existing visitor centers will be razed, and parking for the cemetery on the same side of the Taneytown road with the cemetery makes more sense On these pages, that lot becomes overflow parking again I think that's wrong

o A restroom is added north of Little Round Top, just as in Alternative B--I still can't find the money

p Additional Parking is shown at Devil's Den I think this is wrong.

q Parking is deleted from the tower on Oak Ridge. Why have a tower if there's no place to park The towers are part of the commemorative landscape, so I don't think there's a plan to remove that tower in Alternative C.

r Parking is deleted from East Cavalry Field. I think that's inappropriate

s I can't figure out the Auto Tour Route from these graphics--When does the tour take the visitor up Steinwehr Avenue?

t Page 125 I think the new Visitor Center and the Administrative facilities on the Fantasyland site will be visible from this height and angle There will be some screening by vegetation, but this is exaggerated. The other thing that's exaggerated is the National Tower--out of scale in breadth and height Shouldn't it be in both pictures? I don't see anything in the narrative or budget for Alternative C that removes it.

u Page 127 How will "the extent and location of the Bliss Farm" be indicated? Two lines later we learn that the location of the McPherson, Rogers and Forney houses will be indicated by fencing and vegetation If it's the Bliss Farmstead that will be depicted, won't the same methods be used? If so, why not be explicit?

## RESPONSES

t The drawing on page 125 was meant to illustrate the landscape patterns that would be restored under Alternative C. You are correct that the proposed new museum complex and the administrative facilities may be visible from the height and angle of the view on page 125 of the draft GMP/EIS. A line has been sketched in to represent them. The breadth and height of the National Tower is accurate. Acquisition and removal of the National Tower is in the current Land Protection Plan, so not showing the tower in the sketch of Proposed Conditions is accurate.

u The line you note has been changed to read "... Bliss Farmstead by fencelines and vegetation."

v The specific details of the proposed traffic management system have not yet been designed. The detailed implementation study necessary to further define the proposed system would be completed after NPS selects an alternative. NPS agrees that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. PennDOT is now in the process of advertising for an engineering firm to provide these comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

w The term "useful" has replaced the term "ideal" in the final GMP/EIS.

x The term "before" has replaced the term "during" in the final GMP/EIS.

y Approximately 70% of the collection is from the Rosensteel donation. Its primary strength is related to articles of clothing, equipment, and armament directly associated with the Battle of Gettysburg. Overall, the collection is considered adequate for an expanded story line. However, in some topic areas such as slavery and Reconstruction, it may be necessary to augment the

v Page 163 The Traffic Management System (TMS) has not been adequately described The cost program on page 319 says "Install traffic counters, central information and data system, information displays at the Visitor Center, etc (allowance)." I think the biggest word in that quote is "etc " From what I know of congestion related to GNMP, no traffic management system can work unless data is collected in the borough and townships as well as at the Park and unless real-time information displays are available to traffic management/enforcement authorities in all of those jurisdictions

w Page 167. Farm lanes became *useful* locations for defensive positions when they were oriented to support the needs of a line of battle. Being enclosed on both edges by fencing had little to do with it, and I don't think any soldier would have considered a farm lane an "ideal" location.

x Page 168. ". . .less than 1/3 of the fences present during the battle remain on the battlefield today " Maybe it's less than 1/3 of fences present before the battle--I don't think we can know how many fences were present after the soldiers had been in the area for a few hours--everybody needed to cook, and fences were firewood. I think the Park should always present its decisions in this area in terms of the fences that stood before the armies arrived

y Page 169 What part of the museum collection is the Rosensteel gift? What are the strengths and weaknesses of the collection? Is it adequate to the interpretational requirements of the new museum, with its wider, more ambitious story line? Where's the funding line to fill gaps, or will there be long-term loans from elsewhere in NPS, the Smithsonian, other sources?

Where's the plan to get to work on the cataloging of the Archive? I don't see this addressed very well in the programmatic planning.

z Page 170. The Diorama for the cyclorama--is it really in the plan? Does the Park service own the necessary artifacts or reproductions?

aa Page 172. I don't understand the math on the leasing of agricultural acreage If the Park leased 2,028 acres and got only "$33,000 that the park can use for its maintenance purposes" and sets its rental value at "50% of the prevailing land rates in the area" that would mean that local agricultural land is renting for about $35/acre I know that isn't the case. Farther down the same page we encounter the assertion that, "The agricultural program allows the park to maintain more than 2,500 acres of the park at little expense to the government." Which is it--more than 2,500 or 2,028? When I jump ahead to the table on page 192, I discover an entry for "Crop income $320,250." Even if this is pure gross income to those who lease the land, the leases should be renegotiated--or the accounting methods should be reviewed.

bb Pages 181-187 This appears to be a wilderness of bad editing where the use of numbers in the narrative doesn't track internally or with the tabular data. On page 183 we read "Almost 40% of those surveyed were returning visitors." On page 185, ". . .more than 40% of the park's visitors have been to Gettysburg more than one time." Which is it?

On page 183, "Twenty-three percent of Gettysburg NMP visitors spend 9 or more hours at the site " On page 185, "Twenty-one percent of the park's visitors spend 8 hours or more in the park. . ." Obviously the latter statement is true if the former is true--but a good editor would

collection through either loans or acquisition. There is no budget (or wish list) at this time, since exhibit design for the proposed new museum has not started.

NPS is in the fourth year of a multi-year project to complete the cataloging of the archival collection.

z NPS has not yet determined if it is feasible to restore the diorama as part of the restoration of the Cyclorama painting. The primary goal of the park is to restore and properly mount the painting itself; if restoration of the diorama is feasible, it would be undertaken.

aa Income the park receives from the agricultural program is generated from three different sources. Those threes sources are: 1) rent on the use of historic barns; 2) rent on crop fields, calculated on a per acre basis; and, 3) rent on pastures, based on the number of animals permitted in the pasture and the number of months the animals are actually in the pasture. In addition, all the land and pasture at Eisenhower National Historic Site is included in the total income to the park from the agriculture program. In 1997 the park had 300 animals on 611 acres of pasture and collected $2,744.00 in fees (some of the animals were only on the park for 6 months). The park leased 1,942 acres of crop fields at $14.00 per acre for a total of $27,188.00 and $3,500.00 in fees from the use of historic barns. This totaled $33,432.00 in total income to the park from the agriculture program.

The 2500 acres that comprise the agricultural program also include land leased at Eisenhower National Historic Site. The number of acres leased within Gettyburg NMP is 2028.

The crop income listed on page 192 is an estimate of the gross income earned by the park's permittees on the leased land. This is before taxes, wages, and operating expenses; actual income to the farmers is much less.

bb The correct figure indicated by the actual survey is over 40% of those surveyed were return visitors. A correction to the document has been made.

The more correct statement is that 23% of the park's visitors spend 9 hours or more in the park. A correction to the document has been made.

## COMMENTS

bb (cont.)

have fixed this

On page 183, we read that about 80% of the visitors to the park use the Visitor Center. The survey data quoted was collected in 1994. The table on page 181 estimates total visitors in 1994 to have been 1,748,932. Eighty percent of that number would be about 1,398,700. The table on page 182 reports 1,206,214 visitors to the Visitor Center in 1994. Since this latter number is said to be more accurate, we could estimate the total number of visitors as 1,507,767. The discrepancy is greater than 200,000 if the percentage figure is correct. If we simply divide the number who visited the Visitor Center into the estimated total number, we arrive at a percentage slightly under 70%--is this then a simple typographical error (80% vice 70%)?

On page 183, the math for the use of the Electric Map doesn't check. If 63% of the visitors who used the Visitor Center in 1994 had used the Electric Map, the number in the appropriate column on page 182 would be 759,915 rather than 465,181. If we divide the reported number using the Electric Map by the number using the Visitor Center, we get 38.6% That's a long ways from 63%--How did such sloppy work get into the printed version of the draft GMP?

There's no narrative reporting on trends since the 1994 survey--attendance at the Electric Map and Cyclorama program are down. Number of Licensed Battlefield Guide Tours is up--nearly 20% more tours with visitorship at the Visitor Center down by about 5% in the same period. I think the GMP should do some analysis of this asset--are there enough licensed guides to cover the periods of heavy traffic? Is the new reservation system improving the efficiency of guide use or introducing additional frustration? Since the column addressing LBG is expressed in terms of "tours" I think it was inappropriately converted into "visitors" at the bottom of page 187. Do the Guides keep a count of how many are on each tour? If so, a new column should be added to the chart on page 182 and the number of individual visitors cited on page 187 should be corrected. If not, the statistic should be added in coming years.

cc

P. 186. The sentence that reads "War Department tablets describe the regiments and actions of the Confederate troops. . ." is far too narrow.

dd

P. 188. I believe the operating framework for Eastern National's bookstore includes Eisenhower and the Presidency as well as the Civil War.

If Eastern National operates the park reservation system, who designs, critiques, and upgrades it? I understand it's less than perfect, and its shortcomings aren't addressed in this GMP.

ee

P. 192. From 1995 to 1996, the number of tours given by Licensed Battlefield Guides went up (p. 182). This table indicates that economic impact dropped significantly--more than 30%. What happened?

ff

P. 199. The estimate of the number of vehicles per day on the Taneytown Road is missing.

gg

P.203 Devil's Den and Little Round Top Areas. "Longer-length buses cannot navigate the tight curves." They have already been barred from the Devil's Den area and there are no tight curves on Little Round Top.

## RESPONSES

The other concerns you note are not the result of typographical errors. The difference between the figures represents a difference between what was reported by a sample group at a particular time of the year and the actual counts which are taken by NPS and indicated in the table on page 182. The figures quoted on page 183 are from the visitor use survey taken over a 7-day period in October 1994, while the table on page 182 represents the total visitation for the year. The park experiences different patterns of visitor use throughout the year with heavy use by school groups in the Spring, families and individuals in the Summer and retired individuals and groups in the Fall.

The figures referred to are in table 22, page 182 and contain a listing of all visitation numbers for all key park venues. The licensed battlefield guide (LBG) tours referenced is the type of event, while the figures listed below this indicate the number of individuals who went on tours with licensed battlefield guides. The number of individual visitors cited on page 187 was correct as compared to the number of visitors who went on LBG tours in 1997.

cc The sentence has been changed to read "Union and Confederate corps, divisions, brigades and batteries" in the final GMP/EIS. We have also changed the next sentence to read, "Union and Confederate troops."

dd The book and museum store in the park Visitor Center does include a range of titles associated with themes identified for Eisenhower NHS. A correction has been made to the document to indicate this.

Eastern National does operate the park reservation system at the request of the NPS. They manage the system with park staff providing input on design, operation and upgrades. Since the system is fairly new, the park has been working with Eastern National and the licensed battlefield guides to address any developmental problems. These are expected to be short term in nature and therefore not appropriate for inclusion in the Plan that is designed to provide guidance for park management over the next 10-20 years.

ee The figures on Table 22 show the total number of licensed battlefield guide tours. Table 23, which shows economic impacts upon the Gettysburg and Adams County area, includes estimated revenues only from those guides who

hh P. 204. At the point where the "balance of the one-way avenue system" is introduced, the details of the agreed changes should be inserted--most of us reading this GMP don't know those facts.

ii P. 205. The listing of public facilities should include the picnic areas at the Visitor Center and near South Confederate Avenue.

jj P. 206-207. Park Facilities built on site of battle resources should include the rest rooms and guide stations listed on page 205.

P. 220. The Office of Tom Martin needs to be prepared to share its methodology used to determine "the percent of automobile visitors likely to use a tour bus or a shuttle at the new Visitor Center." This will be a controversial issue.

kk If people really do use the Visitor Center parking lot as a base while taking tour buses and shuttles, I think the estimated length of stay for cars in the lot is too short.

ll "Existing impacts to park avenues were determined through conversations with NPS rangers. The predicted changes in traffic patterns was based upon assumptions regarding the implementation of a Traffic Management Plan." I don't think this is a satisfactory method. Traffic impact on borough/township streets and roads must be included in this analysis. See comments on TMP above (p. 163).

mm P. 222. "Runoff from the Cyclorama Center and its parking lot would continue to cause damage to the Leister barn and orchard." This is an exaggeration. Runoff from the Center can damage the barn and orchard if no drainage interventions are used, but the parking lot is below the orchard and barn. Overstating the problems associated with the "do nothing" option is bad tactics.

nn P. 236. "The Park would continue to staff two Visitor Centers." At first reading I thought it was a shame to hide this way back on page 236. Ordinarily, when we go from two sites to one, we have some personnel savings. But then I looked at page 314 and learned that NPS will need 15.6 additional man-years in the new Visitor Center for "interpretation and visitor services." Somewhere it must be possible to show some personnel cost avoidance or to document the higher level of service available with a significantly larger staff performing this function in a single facility.

oo P. 240. In the first statement of impact of new visitor facilities, the Fantasyland site will be affected on "about 8 acres." About 8 lines down the page it's ". . .6 acres on the Fantasyland site for new visitor facilities." Which is correct? On page 268 we read that, ". . .2 to 3 acres would be disturbed for administrative facility construction." in Alternative C, but that's a different category of use.

pp p.244. Discussion of the new Visitor Center makes reference to "Provision of adequate orientation information. . ." I thought the orientation information the Park made available was adequate, but the facilities for allowing the public to access that information was inadequate. I note that the recommended alternative includes $780,000 for "New interpretive devices, media, maps, guides, etc." (P. 319). I can see why such outlays can't be included in the baseline

are residents of Adams County. If all guide income is included, then the figures for 1996 would have been $728,180, and the figures for 1995 would have been $720,815.

ff The information you have requested is not available. It will be developed as a part of the comprehensive traffic and transportation study that will be undertaken by the Pennsylvania Department of Transportation beginning in 1999. However, NPS does not consider that this level of detail is needed to analyze impacts for this draft GMP/EIS. The information would be available from the comprehensive traffic and transportation study when NPS develops the necessary implementation plans.

gg The statement on page 203 was intended to cover the complex of avenues between Little Round Top and the Rose Farm, south of Wheatfield Road. Some of these smaller avenues have the problems noted.

hh Additional changes to the one-way avenue system have been previously approved and are being implemented. These include: making Howard Avenue between PA Route 34 and Old Harrisburg Road one-way; making Reynolds Avenue between PA Route 116 and U.S. Route 30 West one-way; and making Buford Avenue one-way. This note has been added to the final GMP/EIS.

ii The words, "Picnic areas at the Visitor Center and on South Confederate Avenue are also available" have been added to the final GMP/EIS to clarify this point.

jj You are correct that these park facilities are built on the site of battle resources. However, the symbol set used on this map did not allow these small features to be visible on the mapping. They do appear on the larger maps kept in the park offices.

kk The information in this table is based upon a detailed analysis prepared by the traffic consultant, and the numbers of vehicles entering and exiting the park cannot be added and subtracted to determine the number of parking spaces

| | COMMENTS | RESPONSES |
|---|---|---|
| pp (cont.) | alternative, but if this is a problem it should be included in the budget for alternative B. I suppose my grasp of Park Service planning is primitive, because I can't see why this item would cost $1,092,000 in Alternative D. | required. Vehicles entering the museum complex would stay for different lengths of time depending on the visitor's use of the center. Of the total number of vehicles entering the parking lot, some stay a short time, others for a medium length of time, and some for a long time. The numbers of vehicles left in the lot are based upon the percentages of vehicles staying for different lengths of time. Other small differences are because the numbers have been rounded. |
| qq | "The provision of a theater would..." I thought that the room in the Cyclorama center with theater-type seating could be used as a theater. If a good movie would be such a big help for visitors, why don't we go ahead and make a new one right now? | |
| rr | P.245. Bad tactics again, rolling in "picnic areas" with "amphitheater." There's already a picnic area near the existing Visitor Center. Some people who like things the way they are like having another picnic area off South Confederate Avenue. | |
| ss | P. 249. This page starts with a discussion of staffing that would apparently be Eastern National Employees ("Costs to provide this additional assistance would come from revenues produced by the park Visitor Center. Additional staff to be hired includes curatorial and archival technical expertise and additional park interpreters and guides.") This may be a good idea, but it seems to be poorly expressed. I don't think it's a good idea to use non-appropriated fund employees to handle curatorial and archival tasks associated with government-owned artifacts and documents. I don't think Gettysburg National Military Park hires "guides"--they just examine more candidates for licensing and increase the number of LBGs. And since the budget indicates that the interpretational staff is already planned to go up by 15.6 manyears, what's going on here? | ll NPS considers that the analysis is adequate for understanding the impacts as a result of the alternatives discussed in this draft GMP/EIS. It analyzes the changes created by NPS actions, not the changes that may result from the actions of others. NPS is cooperating with the comprehensive traffic and transportation study that is being undertaken by the Pennsylvania Department of Transportation in 1999. It will analyze and recommend projects to improve traffic flow and safety for locations in and around Gettysburg and the townships surrounding Gettysburg National Military Park. This comprehensive traffic and transportation study should provide the information you suggest. |
| tt | P. 275. In the Direct contributions table I think the Crop Income will go down. There will be far fewer acres tillable by modern means in Alternative C, and even taking hay out of the small plots will be difficult | mm Your observation about the disassociation of the Cyclorama parking lot with the Leister drainage problems is well taken. Although the park has had to intervene and correct drainage at Leister within the past decade, those problems were caused by runoff from the Cyclorama building and walks, not the parking lot. We will revise the final GMP/EIS to correctly state the source of the water. |
| uu | P. 312. "Those costs include four additional people and related support costs necessary to operate the proposed Visitor Center." Again, why does it take more people to run one than it is now taking to run two? | nn The additional staff include the people necessary to meet the park's curatorial, archival, and interpretive needs, as well as those needed to serve in the museum complex. The savings in staff time realized from the combination of the two existing facilities would be dedicated to improving curatorial and archival management, as well as interpretation. |
| vv | P. 316. "Road modifications to restore Hancock Avenue connection to Taneytown Road (existing Cyclorama Center Entry Road to remain to facilitate park tour route)." This is an area where the inadequate graphics earlier in the GMP leave me in doubt. I thought the new auto tour route was to go up Steinwehr to downtown--obviously one way to do that is to take people from the high-water mark (end of the battle) up to the Square (via Steinwehr) and then follow President Lincoln out to the Cemetery. Stop there, then conclude the tour back at the Visitor Center. While there may be some reason to reopen the Hancock Avenue connection to Taneytown road, something much like the connector from Taneytown Road to Steinwehr Avenue will still be needed. The GMP need not go into the detail of regrading and recovering the terrain in the area of the current Visitor Center, but this particular detail may be a bit misleading. Readers deserve a complete picture of the concept for traffic flow in that part of the battlefield. | oo New visitor facilities at Fantasyland, including a youth campground, amphitheater and picnic area, would effect 6.5 acres. Under Alternative D the new visitor facilities would impact the same number of acres as in Alternative C.<br><br>The new Administrative Facility also at Fantasyland, under Alternative C |

would effect 1 to 2 acres of land, including storm water retention. Under Alternative D the new Administration Facility, would be larger and include all of the maintenance division from the Roller Building. Its impact is shown correctly in the draft GMP/EIS.

The discrepancies that you noted on pages 240 and 268 will be corrected in the final plan.

**pp** The dollars listed for new interpretive devices, media, maps and printed guides in item 25, page 319 are those tools necessary (aside from staffing) to provide for enhanced interpretive and educational opportunities throughout the park. These include research, development and production of new waysides, brochures, interpretive guides, maps and electronic media to assist us in telling the stories at the newly opened areas and restored sites throughout the park. The increase in costs associated with this item in Alternative D represents the costs necessary for removal of all modern waysides and interpretive media from the field and research, development and production of alternative, less obtrusive products to educate our visitors.

**qq** The Park currently shows two films in the Cyclorama Center auditorium; however, conservative estimates place production of a new, high quality educational film at somewhere over $1 million dollars. NPS does not currently have a source of funds for production of a new film. The Foundation would provide funding for a new film as a part of the proposed museum complex.

**rr** One of the prescriptions for visitor use and facilities in the draft GMP/EIS called for the location of visitor services and support services where they would not impact significant cultural landscape resources. The relocation of the picnic areas from the current visitor center and South Confederate Avenue would remove them from Major Battle Action areas and reduce potential conflicts. The draft GMP/EIS states that the new picnic site would be natural in appearance, managed to preserve historic features, and screened from the new museum and visitor center complex as well as the amphitheater.

**ss** The staff referred to in Section 4.4.6 on page 248-49 include both National Park Service staff as well as contract employees. The National Park Service frequently contracts for conservation and preservation work on its curatorial,

| COMMENTS | RESPONSES |
|---|---|
| | archival and archeological collections. The mention of Guides in this section refers to an Office of Personnel Management classification series entitled Park Guide. Gettysburg NMP currently has one Park Guide on the staff and under the proposed alternatives NPS would hire more to assist in providing visitor services and some interpretive programs at the new museum complex. The use of Park Guides in these positions allows professional interpretive staff to focus their efforts towards program research, development and presentation. |
| tt | In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes are not that different from modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.<br><br>The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program, would increase the amount of land farmed, and should therefore result in a reasonably stable farm income.<br><br>Before any changes are made to the agriculture program, an implementation plan would be completed. The development of this plan would be in coordination with the park's resource management, interpretative, and maintenance staffs, the current farmers who lease the land, and appropriate state and federal agencies. This plan would outline changes to be made to the program, phasing, and the effects changes would have on soil conservation, wetland restoration, the income NPS receives from the farmers, and the income the farmers receive from selling their crops. |

**uu** The staff referred to in this section would be Park Guides. Gettysburg NMP currently has one Park Guide on the staff and under the proposed alternatives NPS would hire more to assist in providing visitor services and some interpretive programs at the new museum complex. The use of Park Guides in these positions allows professional interpretive staff to focus their efforts towards program research, development and presentation.

**vv** The draft GMP/EIS (page 90) discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the road. The exact location of the proposed feeder road from Taneytown Road to Steinwher Avenue would be determined after completion of a traffic engineering study of the area.

| COMMENTS | RESPONSES |
| --- | --- |
| Oct. 16, 1998<br><br>Dr. John Latschar, Superintendent<br>Gettysburg National Military Park<br>97 Taneytown Rd.<br>Gettysburg, Pa. 17325<br>Dear Dr. Latschar:<br>I hope that you will implement the preferred alternative for Gettysburg National Military Park. Your plan sounds suitable and stirring! I can't wait to visit the Park when it is finished. It will be a much-visited historic highlight for many, many Americans. Thank you for creating such a comprehensive plan for this military park.<br><br>Sincerely,<br>M. Ruth Niswander | **Ruth Niswander** |

August 31, 1998

Mr. John Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Rd.
Gettysburg, PA 17325

Dear John:

This letter is a formal comment upon the Draft General Management Plan dated August 1998.

At several points in this plan trails are addressed. These include Table 5, p. 76, actions in table on pp. 92-94, table 13, p. 154, section 3.3.7 on page 187, p. 208, p. 226, and p.237.

To summarize these suggestions: non-historic trails will be removed except where needed to connect historic lanes and provide good circulation and historic lanes will be rehabilitated and reconstructed.

I have no objection to this general plan. The Park should determine where and how lanes and trails should be. Once such lanes and trails are

a established, however, they should be open to bicyclists as well as to pedestrians and horses. Your plan documents the damage that horses have done to trails. It makes no sense to allow horses but not to allow the less damaging bicycles. I've sent both you and your predecessor ample materials demonstrating that horses, pedestrians, and bicycles can share trails safely. If, in fact, you are unwilling to have both bicycles and horses on a trail, the less destructive option is to ban horses.

There is no rationale, other than past practice, for banning bicycles from the trails you establish. A General Management Plan should move beyond past practice to determine what is best for the future. **Please end the irrational, discriminatory, policy of banning bicycles on trails open to pedestrians and horses.** Thank you.

Sincerely,

Bob Nordvall

Robert Nordvall





## Bob Nordvall

a Bicyclists would continue to be allowed to use the 35+ miles of paved park avenues and roads. This would provide adequate access to interpretive and historic sites for bicyclists without causing potential conflicts with horses and pedestrians.

| COMMENTS | RESPONSES |
| --- | --- |
| DR. John Latscher, Superintendent<br>Gettysburg National Military Park<br>97 Taneytown Road<br>Gettysburg PA 17325<br><br>Sir;<br>As a member of the Friends of the National Park at Gettysburg, I write to thank you for your efforts to improve the Park. I am pleased with recent progress.<br>I believe The Park should be as commercial free as possible, and as much area as possible should be returned to the appearance at the time of the battle.<br>I urge you to continue your good work.<br>Respectfully,<br>Robert O'Callahan | Robert O'Callahan |

Author: Owl at NP--INTERNET
Date: 9/28/98 4:01 AM
TO: GETT Public Affairs Office at NP-GETT
Subject: trees
---------- Message Contents ----------

I seen in the paper that the parks service plans on cutting 576 acres of trees from the battlefield because it doesn't look like it did during the battle. That most visitors don't realize that it didn't look this nice during the battle. If you are looking for authenticaty then are you going to put bodies around and remove the monuments. Didn't you kill the deer because they were eating the trees and vegetation. Just what is the game plan here. That new visitors center definitely wasn't there during the battle, so I guess you won't be putting that in now.

It is a beautiful place to reflect and get a glimpse of the past and understanding. Remember it is called Gettysburg National Military PARK. Don't cut the trees. Please keep it like it is - a park to the past.

**owlpa1701**

## COMMENTS

Dear Dr. Latschar,

As a member of F.N.P.G. I'm writing to say that it is important that the General Management Plan move forward rapidly. This is necessary to protect our cherished heritage. We the members of F.N.P.G. appreciate the opportunity to be heard.

Thank you.

Sincerely,

Name Richard C. Palaski

Address

## RESPONSES

**Richard C. Palaski**

**Dear Dr. Latschar,**

SIR:

Thank you for the opportunity We have to be heard, & please help to get the plan moving forward.

Sincerely,

Name Robert Paprocki.

Address

**Robert Paprocki**

## COMMENTS

Dear Dr. Latschar,

I hope you will lend to the moving forward of the General Management Plan for the Gettysburg Nat. Military Park. Thank you for all you have done in the past.

Sincerely,

Name Michele Parisi

Address

## RESPONSES

**Michele Parisi**

Dear Dr. Latschar,

Please do what you can to aid in moving along the General Management Plan. We love to visit Gettysburg!

Sincerely,

Name Michael & MARGARET Parmer

Address

Michael & Margaret Parmer

## COMMENTS

AUGUST 19, 1998

DR. JOHN A. LATSCHAR, SUPERINDENDENT
GETTYSBURG NATIONAL MILITARY PARK
97 TANEYTOWN ROAD
GETTYSBURG, PA. 17325

DEAR DR. LATSCHAR:
SO VERY NICE TO RECEIVE "DRAFT GENERAL MANAGEMENT AND ENVIRONMENTAL IMPACT STATEMENT". AS A LONG TIME MEMBER OT THE BALTIMORE CIVIL WAR ROUNDTABLE I HAVE HAD MUCH INTEREST IN GETTYSBURG. NOW THAT I RESIDE IN MOBILE IT IS NOT POSSIBLE AS I WOULD LIKE TO.ONE ONLY HAS TO RESIDE IN OTHER AREAS TO QUICKLY BECOME AWARE OF THE DIFFERENCE. TO MENTION ( BLAKELEY ) IN BALDWIN COUNTY ALABAMA. THERE IS NOTHING THERE IN THE NATURE OF DESCRIPTIVE INF. MONUMENTS OR PROPER SIGNAGE. NOT AVAILABEL PRIMARILY THRU GOOD MANAGEMENT AND FUNDS. RECENTLY I ATTENDED THE DEDICATION OF THE JEFFERSON DAVIS LIBRARY AND MUSEUM AT BILOXI OPERATED BY THE "SONS OF THE CONFEDERACY" BEAUTIFUL, AN ADMISSION CHARGE OF $7.50

R/E GETTYSBURG, I LIKE A LOT OF FOLKS COULD MAKE SUGGESTIONS BUT THEY WOULD ONLY IMPEDE THE DECISION , THEREFORE I STRONGLY SUPPORT THE DECISION THAT THE NATIONAL PARK SERVICE PLANNING TEAM WOULD DECIDE UPON. THERE IS WORK TO BE DONE AT GETTYSBURG. IT WOULD SEEM TO ME THAT THE NATIONAL PARK SERVICE HAS "FOUND THAT GOOSE WITH THE GOLDEN EGG " ON MY LAST VISIT "THE TOWER WAS STILL THERE !

SINCERELY,

William H. Pearson, Jr.

WILLIAM H. PEARSON JR.

## RESPONSES

**William H. Pearson, Jr.**

Edward J. Pekor

October 1, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent:

I am writing to comment on the proposed General Management Plan for Gettysburg National Military Park.

Overall, I am in support of the new Visitor Center proposal and the restoration of the park's terrain as described in Alternative C of the GMP. The need to preserve the artifacts and the Cyclorama painting is crucial.

I would like to make three comments regarding the proposal and the future of Gettysburg:

a 1) The cafeteria proposed for the Visitor Center should be eliminated. There is no compelling reason for the inclusion of a food service in the Visitor Center. The noise, congestion, and food smell would not be appropriate for a museum/information center environment. There are plenty of restaurants near the proposed location so people would not starve. Also, I have been to many sites in the National Park Service and I can not remember any Visitor Center at any park site ever providing a food service.

b 2) The Wills House and the railroad station should be included within GNMP. Interpretation of the Gettysburg Address aspect of the park would be enhanced greatly by the inclusion of these two sites within the park boundary. The fact that the Wills House is in private hands is disturbing.

c 3) I would like to see development of a Gettysburg Campaign program. Perhaps this effort could be patterned along the lines of the Civil War Trails maps that the state of Virginia has developed for the 1864 Lee vs Grant campaign and the 1865 Appomattox campaign. The park should spearhead such an effort among the related sites and the states of Pennsylvania, Maryland, and Virginia.

Thank you for keeping me informed as to the GMP process and I hope you will take my comments into consideration. Preserving Gettysburg for future generations should be the overriding concern.

Sincerely yours,

Edward J. Pekor

Edward J. Pekor

## Edward J. Pekor

a NPS evaluated the impact of the cafeteria-style restaurant in the proposed park visitor facility on the local tourist economy. The analysis found that even with the inclusion of food service in the park museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the park's food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a limited food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

b Neither the Wills House nor the Lincoln Train Station are currently inside the boundary of Gettysburg NMP. However, the draft GMP/EIS proposes that a boundary revision be made to include the Wills House. If approved, this would allow the potential NPS acquisition of the Wills House. The Lincoln Train Station was recently acquired by the Borough of Gettysburg. Since that significant historic property is now in public ownership, the NPS would cooperate with and assist the Borough of Gettysburg in its appropriate restoration and public use.

c The suggestion for a Gettysburg Campaign program is consistent with the interpretive themes proposed in the draft GMP/EIS. The NPS will consider this suggestion during the interpretive design of the proposed museum.

## COMMENTS

September 24, 1998

Dear Sir, Ms, etc.

a I understand there is a plan to let private commercial development build on land that is part of the Gettysburg Battlefield. I think this is a very bad idea and desecrates that battlefield, while the Park would get a new visitors center out of the deal. that doesn't justify it. you can and I think must find a way to get this done without a restaurant, gift shop and other tawdry gimmicks for private profit. Let me know what's going on!

Faith Petric

## RESPONSES

### Faith C. Petric

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

Oct 9, 1998

Dear Dr. John Latscher,

I wonder if the soldiers who died on the battlefield of Gettysburg would be pleased with the planned death of so many trees and the displacement of so many animals.

I, myself, protest more loss of life and the destruction of our habitat and the animals homes.

Sincerely and prayerfully,

Arlyn Pettingell-Miller

**Arlyn Pettingell-Miller**

## COMMENTS

Aug. 21, 1998

Mr. Robert G. Stanton
Director
National Park Service
1849 C St. N.W.
Washington, D.C. 20240

Dear Director Stanton:

I have grown increasingly disturbed at the controversy and rhetoric surrounding both the 1998 General Management Plan and the proposal for a new Visitor Center/Museum at Gettysburg National Military Park. My primary concern is that the heated statements dispensed to the local citizens by those who have, from the beginning, opposed any change at all at the park, will mislead decision makers into altering or modifying a position which has been taken after long, careful, thoughtful consideration based on park needs and modified by substantial public input.

I am in the process of researching the history of the development of the national park at Gettysburg and it is evident that the Gettysburg battlefield has been the center of controversy almost since the battle itself ended.

In 1893 a hue and cry was raised by Union veterans over a proposal to erect a statue along the Confederate battle line honoring Gen. Robert E. Lee. The project was completed however and the site is now one of the most visited areas on the battlefield.

In 1907 the townspeople of Gettysburg were up in arms because the state of Pennsylvania Monument Commission failed to select the town square as the site for the Pennsylvania monument, choosing instead to place it on the Union battle line of July 2 and 3. In October, 1908 the local newspaper complained, "They paid no attention to the unanimous voice of Gettysburg for a building." Given the traffic situation in Gettysburg today one might now add "fortunately".

One of the greatest controversies, and one which still continues today, was the Department of Interior trade-off on the location of the so-called "national" tower.. Faced with potential construction of the tower on land immediately adjacent to the Pickett/Pettigrew charge area, the DOI opted (properly many agree) to offer 6 acres of park land east of the Taneytown road in exchange for the initial construction site so close to critical battlefield land. The majority of citizens, both locally and nationally still call for removal of the tower but when told of the original site plan most agree that the decision to exchange land was the best that could have been done under the circumstances.

The previous "master plan" for Gettysburg National Military Park was begun in 1969 but was not finally adopted until 1982, a period of 13 years during which one local controversy after another erupted. Lack of an approved plan left the park without formal guidelines on which to base responses. Foremost among these controversies, and the one most closely resembling the present one over the proposed Visitor Center/Museum complex, involved the proposed construction of a new visitor center at a location other than the one then in use, followed by the subsequent purchase of the Butterfield farm as the site of choice.

## RESPONSES

### Barbara Platt

Initially the 1969 park plan called for a new visitor center in one of four possible locations, all on battlefield land: the Mehring farm, the Winebrenner farm, the McPherson farm, and an area near the Peace Light. Opposition and support was directly related to a specific site. In general however the local public was opposed if the site was in close proximity to their neighborhood and businessmen were opposed because every site was located three to four miles from the present Visitor Center location across the street from their restaurants, gift shops, and "museums".

The Travel Council, Retail Merchants Association, Chamber of Commerce and other organizations all opposed moving the Visitor Center away from the borough. There were dire predictions that such a move would devastate both downtown Gettysburg and the Steinwehr Ave. "strip".

The Gettysburg Planning Commission also opposed the development of the Butterfield farm but endorsed further study of the McPherson site as a location for the center. This position was also adopted by the Cumberland township supervisors. I believe it is safe to say that had the park agreed to construct the new visitor center on the site now included in the Kinsley proposal rather than on one of the sites originally considered virtually all opposition would have vanished.

When the "master plan" - by then titled General Management Plan - was released to the public in June 1977 the most immediate public reaction was to oppose closing the National Cemetery to vehicles. The park backed down and not until 1988 was the cemetery finally closed to vehicular traffic. Meantime the cemetery continued to suffer damage from cars and buses during the intervening years. Since its closure the move has been met with almost universal approval by visitors and residents alike. As in so many instances the opposition was almost entirely local. Meanwhile the failure of the U.S.30 by-pass to become a reality led the park to abandon plans to construct a new visitor center on the Butterfield farm.

In March 1980, with the GMP still not finalized, the proposal to return Little Round Top to it's 1863 appearance, by removing brush and trees which had grown up over the years, caused a local uproar. Although strongly favored by historians both locally and nationally local residents raised their voices in protest. One wrote that the Park Service "was not established to destroy beauty", and argued that many visitors, and especially local citizens, often went to the battlefield to enjoy the scenery, especially the flowering shrubs and other plants.

The controversy grew during the year with vehement letters to the local paper, phone calls to congressmen, and a "Committee on National Parks to Prevent Tree Cutting at the Gettysburg Battlefield" being formed by local citizens. At their behest Rep. Bill Goodling initiated a congressional investigation and members of 10 local organizations which formed the above mentioned committee accused the NPS of "undemocratic procedures in failing to hold public forums for an exchange of ideas prior to beginning the massive desecration of the battlefield." The committee retained a lawyer and contacted then Pennsylvania governor Richard Thornburg, as well as a number of federal agencies and committees asking for support to prevent the tree cutting. On the other hand Dale Crane, consultant to the congressional committee on National Parks and Insular Affairs at that time was quoted as saying the NPS has "a legal and moral right to clear portions of the battlefield." "The Congress did not set up the park to preserve natural values" he said, "It was established to preserve historical values." The biggest complaint now is that Little Round Top is not kept clear enough.

Early in the 1990's there was another outburst of local resentment over the park's decision to establish one-way traffic patterns on some of the more heavily traveled park avenues in order to protect the resource. Residents were using them as convenient short cuts for commuting and for travel to town. But they have now adapted to the new traffic patterns and little is heard of the matter.

Even more recently there was vehement opposition from park in-holders and others living adjacent

to the Emmitsburg Road because the speed limits on that road had, in the interest of visitor safety, been lowered by 10 miles per hour which thus required an extra 23 seconds of driving time to reach the borough limits.

In all these cases, except the cemetery, the NPS has held firm, the changes were initiated and the public has since then accepted them. There are few, if any, complaints expressed today and indeed the general public, especially the park visitors, express appreciation when these changes are brought to their attention.

The above information should illustrate that controversy has always been, and in all liklihood always will be, a part of Gettysburg National Military Park which by its very nature arouses passionate feelings. Even after 13 years of review, public comment and alteration the final GMP document in 1982 met with opposition from several sources. It is clear that nothing the park does will meet with universal approval particularly among local residents.

I have served as a member of the park's Advisory Commission for over 4 years, although this letter is written in my role as a private citizen. However as a member of the commission I have followed closely the development of the Visitor Center/Museum RFP, the creation of the GMP, and the selection and negotiation of the Kinsley proposal. I urge you in the strongest possible way to hold firm against a very vocal but limited group of local opponents to these plans. Having attended every public meeting on these subjects I am well aware of the opposition and also that coverage in the local press has been significantly one-sided and slanted against the park's position. I would also add that those now claiming lack of information and demanding an extended comment period were seldom in attendance at the many meetings held over the past three years. The opportunities for securing information on all facets of these projects were available but they did not utilize them It is incredible, that with all the meetings and publications sponsored by the park, local officals now claim they were not aware of what was going on. In truth they made no effort to know.

I would also like to add that I recently received a letter from Rep. Goodling in which he said, "We must provide for the preservation of priceless artifacts currently unprotected and at risk. Such protection is long overdue and desperately required. The existing visitors center is entirely inadequate and restoring some of the most sacred ground on the battlefield should be another long-time goal. Providing significantly increased revenue to our area, greatly benefitting the local economy, should be another goal." "To be clear, I believe public-private partnerships can work if done correctly."

Throughout its existence the park has resisted strong pressures to alter its postions in response to individual and group centered desires and has followed through with actions that have worked to the benefit of the American people. I hope this will be the case again in this situation as I am convinced that the outcome will be a most positive one in the effort to protect and preserve this icon of U.S. history.

Sincerely,

Barbara Platt

Barbara Platt

cc: Supt. John Latschar
Sen. Rick Santorum
Sen. Arlen Specter
Rep. Bill Goodling

October 15, 1998

Dr. John Latschar
Superintendent
Gettysburg National Military Park
Gettysburg, Pa. 17325

Dear Dr. Latschar:

I would like to compliment you and your staff on a well designed General Management Plan based on excellent research and written in a most professional manner.

I am very pleased with Alternative C even though I personally would prefer a more extensive restoration of the historic landscape and the National Cemetery than is envisioned in this alternative. However I do believe that post battle additions to historic structures to make them suitable as housing units should be retained since preservation of such structures would be more easily maintained if they are occupied than if left standing vacant.

I would also prefer to see the wayside exhibits remain in place to assist visitors in understanding the course of the battle and as a practical matter I would also favor the retention of the existing restrooms on the battlefield.

The above suggestions obviously refer to elements of Alternative D which has many appealing features which I would encourage be folded into the preferred Alternative C. However if this should be done I would not recommend reinstalling the War Department post and pipe fence to delineate the commemorative landscape from the battle action area. Such fencing would pose a real visual obstacle to viewing the battle area except for those fortunate enough to have an excellent imagination. Mowing to denote the commemorative area poses no such visual intrusion and should be the method of choice. Monuments now in place obviously should remain. a

Because of the concerns expressed by some individuals it might be of benefit to the park to meet with local landowners not only near the battlefield but throughout the county to establish a park sponsored program to plant trees and shrubs on unused land to "replace in kind" acreage from which such flora has been removed as part of the restoration of the historic scene of the battlefield. However the park should not yield to those who wish to prevent such historical rehabilitation. As several individuals have already said at public meetings the battlefield is neither a nature preserve nor an arboretum. It's importance lies in the historical events which took place there. b

In summary I cannot accept either alternative A or B but readily accept Alternative C preferrably with the above listed incorporation of specific portions of Alternative D.

Furthermore I wholeheartedly support the public/private enterprise to build a new Visitor Center/Museum. It has been well done and offers the best, perhaps the only, hope of preserving the historic artifacts and archives of the battle while at the same time permitting maximum restoration of that portion of the battle action area now intruded upon by non-historic buildings.

I do feel that the GMP should emphasize more strongly the removal of the Ottenstien tower by whatever means possible. It is an abomination and certainly the most detrimental of all intrusions c





## Barbara Platt

a The intent of Alternative C, the proposed plan, with respect to reconstruction of pipe-rail fences has been clarified. Under Alternative C, selected pipe-rail fences and other commemorative features, like bollards and gutters, would be reconstructed when needed to serve park resource protection and management needs. NPS believes that restoration of a historic commemorative feature for these purposes would be preferable to introducing a new, modern designed element into the Battlefield Commemorative Resource Area of the park.

The reintroduction of pipe-rail fencing along some of the park's avenues should not deter visitor views. Although opinions vary about the aesthetics of various aspects of the both the commemorative design and the vernacular battlefield landscape, the pipe-rail fencing was nonetheless part of the original design effort that transformed portions of the battlefield into formal park environs. The fencing enclosed and set off the formal lawn, monuments, cannon, and avenues and was one of those "artistic and patriotic effects" envisioned by General Daniel Sickles in 1894. As one of the features that was to give "added glory and significance" to the Gettysburg battlefield, the pipe-rail fencing was an integral and early part of the park's design effort. Although today's visitors often demand immediate access to all parts of the battlefield, NPS considers that the reintroduction of avenue fencing would not unnecessarily impede respectful use of and access to the battlefield.

b Thank you for your suggestion. If an alternative that requires removal of vegetation is chosen by NPS, the park would work with its neighbors and partners to look for opportunities to assist in re-vegetation projects outside the park boundaries to help establish wooded areas that would not impact the historic landscape.

c It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site."

| COMMENTS | RESPONSES |
| --- | --- |
| on the historic scene of the battlefield.<br><br>Again my congratulations on a most thorough and well prepared General Management Plan. It is a job well done!<br><br>Sincerely,<br>Barbara Platt<br>Barbara Platt | |

11-3-98

Dear Dr. Latschar,

Please help the General Management Plan move forward. We need a new museum! We are coming to GNMP for the 9th consective year this July. Thank you for making it so cherished a park. The Park Ranger's talks and walks are lawsome! They are great and so is the Park. I do love Gettysburg.

Sincerely,

Name Loretta Pollack

Address

P.S. Please keep the anniversary walks and talks (in Pitzer Woods) We look forward to them.

**Loretta Pollack**

# COMMENTS

Author: "Sal Prezioso"
Date: 10/17/98 3:11 AM
TO: GETT Public Affairs Office at NP-GETT
Subject: Comments on the NPS Management Plan
---------- Message Contents ----------

To Ms. Katie Lahon and Dr. John Latschar:

We are submitting these comments to Dr. Latschar and yourself for inclusion as public comments to the Park management plan.

First, let us state that we are in basic agreement with the need for a new visitor's center and the concept of a limited commercial partnership to accomplish building the center as has been proposed. We believe that with the absence of any significant government funding, there is probably no way that a new visitors center can be accomplished without this or a similar type of concept.

We also agree with moving the visitors center from its current site to an area that includes either the Fantasyland property or portions of the Levan tract. This also assumes that historically significant parts of that property will be evaluated regarding placement of facilities or parking. For the park to grow, some of these changes are necessary.

a We do have concerns that if all of the parking by the visitors center is removed, that visitors will not be able to access the area at the Angle as many do today. Access to that area is one of the things that many people enjoy and find most moving of the many facets of the Gettysburg Battlefield. Limiting that access by either distance from walking or by shuttle routes will significantly detract from the overall Gettysburg experience. We believe it will cause a significant negative impact on the area merchants as well.

There is a concern with those aspects of the plan that involve the clearing of trees through so much of the park. While understanding the concept restoring sight lines where possible, and bringing the Park grounds back to the state they were in where practical during the battle, We have several concerns as to the real overall effect they will have on todays Park. For example, will buffers be used around areas of the Park that are bordered by housing and subdivisions.

b In our particular case, we believe that Shultz's Woods which is across the street from our home (Red Patch) was here during the battle. (although we are not sure how much was there) Does that mean that if the woods were not there, that they will now be leveled so that it may look like it did during the battle? Instead of the woods that we currently view, we would get to look at a housing development. One of the things that we found so attractive about our property was that we viewed the woods that were part of the park never imagining that they would be developed or cleared because they were part of the park. If the area was cleared, in addition to being totally unnecessary, We believe it would significantly diminish the value of our home and property. This we have a serious problem with.

While pointing out our own particular circumstance, we believe it is a situation that would affect other people in similar circumstances that live both within and outside the borders of the park. While optimistic that cool heads and rational people would make appropriate and practical decisions regarding this type of issue, we cannot assume that this will be the case which is the reason for our stating our concern for the record.

# RESPONSES

## Sal and Gail Prezioso

a Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new musem complex to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

b Schultz Woods on the west side of Confederate Avenue (where the stone wall is standing and where the Confederate cannon are located) is an historic woodlot and would remain under all the action alternatives.

The majority of woodlands that are proposed for removal are located within the central portions of the park (for example, between Devil's Den and Confederate Avenue). Their removal would reintroduce historic views of the battlefield, primarily on battle action sites, without introducing views of nonhistoric intrusions. However, NPS would also be removing woodlands, hedgerows, and other vegetative growth near or on its boundaries that currently obstruct historic views of the battlefield. Although some of these areas are adjacent to modern development, the increased ability to see the historic terrain and key topographic features would enhance visitor understanding of the battle and the significance of battle features that are currently obstructed by this incompatible growth. In many cases, nonhistoric woods that were planted or allowed to grow in order to hide modern development have obscured key terrain and fields of fire and thereby themselves detract from the 1863 appearance of the battlefield. As a result, some portions of the battlefield have not only physically changed in appearance but have ceased contributing in any significant way to visitor appreciation of these battle sites. NPS would not entertain any new introduction of wooded areas to obscure development if that new vegetation would obscure significant battle topography or historic views (fields of fire).

Another concern is that once these areas are cleared, where will the money come to maintain these deforested are to keep them that way. We make the assumption that the open lands became thick with forest and vegetation due to the fact that they were not able to be kept cleared in the first place. Either due to lack of funds or effort. What will prevent that from happening again and to what purpose, either by the changing vision of a future administrator or future lack of funds?

c If the original fence lines and boundaries are reestablished, it will not be profitable for farmers to make economic use of many fields due to the smaller size. Congress does not seem inclined to be granting much in the way of significant additional funding, even with the possibilities of budget surpluses. Obviously, its the same reason for the partnership concept for the visitors center, no foreseeable chance of government funding.

While we have only lived here for about a year, our experience so far has been that the Park personnel are either undermanned or underfunded due to budget constraints and are thus not always able to do things that need to be done due to circumstances beyond their control. This is said in no way to blame the Park service but to state the obvious problems you are forced to deal with in just handling day to day maintenance issues.

A case in point: Last June we reported a large tree that had broken in half behind the wall across the street from our house near one of the informational markers and cannon. We called because it represented a potential hazard, either from eventually falling further due to other breaking limbs, or from kids climbing up the trunk and falling or injuring themselves. While nobody has fallen, we have seen several kids climbing it. We called regarding this in June, and have mentioned it on 2 other seperate occasions to maintenance personnel that were working on this side of the wall at the time. Everyone has been extremely polite but there are other priorities and the tree still remains as it did the day it fell. It is now October.

Also, back in June we had inquired regarding the repainting of the Park sign in front of our house. It has obviously gone unpainted for a number of years. Since we now live in the house, we thought it would present a better appearance if it was repainted. We had inquired of Dr. Latschar if it was something we could do ourselves but he pointed us in the direction of the appropriate park service personnel since it was a NPS sign. We contacted the department as he directed back in June. Again, it is now October and the sign remains the same.

Again, we understand there are priorities and that people can only do so much. We realize that there are budget and time constraints. This is not perceived as personal although we am somewhat frustrated. It is pointed out here as an example of our concern for the future. How will future upkeep in the Park be maintained when there will be even more upkeep required than is currently needed?

We are sending these comments because as citizens, it is necessary to provide feedback and input when and where it is required by various situations. It is like voting, it is a responsibility. If we are not part of the process and discussion, we are part of the problem.

We do not envy the job that Dr. Latschar has before him and wish him luck and best wishes throughout the process, My wife and I offer our prayers for his success in this endeavor. He will never be able to please everyone at the end of the day because everyone holds there opinions regarding Gettysburg as sacred as the battlefield itself. And everyone honestly feels that their opinion and vision is the right one.

Please make our comments part of the record regarding the management plan and a response at some point would be greatly appreciated.





c In preparation for the GMP, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes are similar to modern field sizes, so returning the battlefield to smaller field sizes should only have a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed, and should therefore result in stable farm income.

| COMMENTS | RESPONSES |
| --- | --- |
| Thank you for your time and consideration in this matter.<br><br>Sal and Gail Prezioso | |

**Dear Dr. Latschar,**

The General Management Plan for the National Parks at Gettysburg should move forward quickly. Please make it a reality.

Sincerely,

Name William C. Prinn - 9/23/98

Address

**William C. Prinn**

## COMMENTS

Author: JerryProv 9/28/98 6:51 PM
TO: Bruce Babbitt at ~IOS
Subject: Gettysburg Visitor Center
---------- Message Contents ----------

a Sir: I am very concerned about the impact of allowing a $40m private developed visitor center on the hallowed grounds of Gettysburg. This will threaten the very ground that we are bound to preserve, and may create a blight much like that damned tower we have had to live with so long. Please reconsider the historical impact of this decision.

Sincerely,
Gerald T. Provencher and family

## RESPONSES

### Gerald T. Provencher and family

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

Dear Dr. Latschar,

a Move the General Management Plan forward. But do not put an arcade in the Plan. It would be horrible to have an arcade on sacred grounds.

Sincerely,

Name Mr + Mrs L Quirk

Address



## Mr. & Mrs. L. Quirk

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>PLEASE MAKE EVERY EFFORT TO SUPPORT THE GENERAL MANAGEMENT PLAN AT GETTYSBURG NATIONAL MILITARY PARK – THE FRIENDS OF THE NATIONAL PARKS AT GETTYSBURG – THANK YOU FOR LISTENING!<br>Sincerely,<br>Name J. RAKES<br>Address | J. Rakes |

October 8, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Re: Draft General Management Plan and Environmental Impact Statement (GMP)

First, let me thank you for the opportunity to comment on this plan. I believe that overall the Gettysburg National Military Park personnel have done a creditable job in providing the public the opportunity to comment during the development of these plans. The fact that I received the "Draft Plan" on August 17, speaks to the fact that the GMP has tried hard to inform the public in a timely way. In addition, I had the opportunity to observe the public hearing on Thursday September 30 at the Cyclorama; that meeting gave me a real appreciation for the controversy surrounding the "Draft Plan."

The following comments are based on experience life has provided me, specifically; a lifelong interest and study of the Battle of Gettysburg, extensive experience with not-for-profit organizations, (I'm currently president of Harborfestivals Inc. one of the top 100 sites to visit in the US) and a broad knowledge of tourism based on being involved with the tourism industry in Niagara Falls, NY for most of my adult life. The fact that I have been involved in government service for a long time provides me a thoughtful insight to what the "Draft Plan" document involves and its relationship to subsequent government decisions and actions.

After a careful review of the 329 page "Draft Plan" it is my opinion that "Alternative C" most closely provides the "management prescriptions" needed to protect the resources of this "hallowed ground" in addition to meeting the needs of the millions of visitors over the next two decades.

My review of the document leads me to make the following points:

- "Alternative C" offers the best solution to the long-term needs of the park and its visitors.
- "Alternative A" is unacceptable, because it would result in the deterioration of the park and a loss of visitors, negatively affecting the economy and quality of life in the Gettysburg area.
- "Alternative B" while attractive is close enough to "C" to be dropped in favor of the latter.
- The last "Alternative D" while being very attractive to the historian in me, is impractical to implement and would I believe be too expensive to maintain. Conversely, I do not believe this alternative provides increased benefit to the general visitor or to the socio-economic well being of Adams County.

Having read the "Draft Plan" I would like to make the following specific comments on elements proposed under "Alternative C"

a

- Under Management Zones, I do not agree with the "no new monuments" idea and further more I believe that if there are new monuments placed they should follow the pattern established during the commemorative years. The placement, size, and lack of a traditional pedestal for the Longstreet statue were wrong.

## Michael V. Redding

a The park proposes a ban on new monumentation as a means to preserve the historic integrity of its nationally significant battle and commemorative landscapes, both of which are intimately associated with the soldiers who fought at Gettysburg. The increasing addition of contemporary memorials detracts from the Government- and veteran-built monuments and inevitably changes the park that was first envisioned and created by the battle veteran.

## COMMENTS

2

b I believe that the removal of 576 acres of woodlands, the construction of 39.1 miles of fencing, along with the development of 160 acres of orchards is **excessive**. A scaled back version of the proceeding improvements is a compromise the park must consider. However, the removal of the dense growth on lower Cemetery Ridge along Plum Run is necessary.

Restoring the Rose Barn, Bliss farm site, Wentz and Rodgers house foundations, and providing access to the Weikert (Timbers) site are very desirable aspects of the plan.

c The idea of returning to the 1863 agriculture patterns and historic lanes on significant portions of the field has merit, but again the park needs to compromise. Like the woods question, the park needs to be receptive to the idea of restoration of only the most significant areas.

In the commemorative areas, restoring the monuments, tablets and other significant items of that period, allows this important historical aspect of the park to interpreted. We must allow the visitor to appreciate the vision the veterans had for Gettysburg and the contributions of pioneers like Cope in developing the Park. Two suggestions in this area are: provide access to Neild Avenue as a way of showing what the commemorative era looked like and include at the new visitor's center an exhibit on the history and development of the park (highlighting Cope's work).
-One specific recommendation I **oppose** is the replacement of the existing historic ornamental fence between the National and Evergreen Cemeteries with pipe-rail fencing.

Saunder's plan for the National Cemetery should become an interpretative theme for the visitor and a limited restoration of the civil war section of the cemetery undertaken.

The park should assume the responsibility for the Wills house and train station and combine them with an expanded program of interpretation of the role of the borough of Gettysburg during and after the battle. A closer relationship beneficial to both the park and the borough and Adams County needs to be developed.
-One specific area in need of attention is the restoration and protection of **Coster Avenue** and the **mural** an example of a commemorative area.
-The Park should **immediately** take an active role in working with the Farm District in the development of the Alms House site to preserve as much as possible of the historic viewshed and terrain.

Combine the Park administrative and maintenance facilities to improve efficiency. Locate the facility on non-historic land

d Monitor and control traffic patterns and institute a limited shuttle service from the new visitor center. However, any restriction of the avenues to private vehicles needs to dealt with independently. The right of the visitor to explore the park on his or her own or with a Licensed Guide must continue.

Develop a Gettysburg Campaign interpretive program to incorporate sites away from the central battlefield, such as Cashtown, Fairfield, Hanover and others areas significant to the this theme. Provide the resources for preservation, restoration, and acquisition of sites. Provide consistent to GNP interpretive guidelines, markers, and tablets as in the National Park. This would provide a greater economic benefit by prolonging the visitor stay and developing the regional tourism industry.

## RESPONSES

b NPS would not manage its orchards for fruit production. This limits the need for use of spraying and for intense management practiced in fruit producing orchards.

NPS believes that the reintroduction of some of the fencing present at the time of the battle would help visitors understand the impacts of the action on the soldiers and non-combatants involved in the fighting. The mileage figures noted in the document are the maximum that NPS might consider reintroducing to the battlefield. Fencing would be built only when considered important to meeting NPS' interpretive goals and when it can be adequately maintained.

c NPS believes that the reintroduction of some of the fencing and historic lanes present at the time of the battle would help visitors understand the impacts of the action on the soldiers and non-combatants involved in the fighting. The mileage figures noted in the document are the maximum that NPS might consider reintroducing to the battlefield. These features would be built only when considered important to meeting NPS' interpretive goals and when they can be adequately maintained.

d Under all the alternatives described in the GMP/EIS, visitors would continue to be able to explore the park on their own or with a licensed battlefield guide.

- Develop a closer working relationship with Gettysburg College by establishing programs, which benefit both organizations. For example, an historic preservation course using the Park as the classroom.

Finally, a few thoughts on the proposed visitor center proposal, a central theme to this alternative and the debate over the "Draft Plan." I **favor the establishment of a new visitor's center** and if ultimately approved its location on the site identified off Hunt Avenue and the Baltimore Pike. It is unfortunate that the issue of the visitor center has become so controversial that the "Draft Plan" has lost some of its significance. Nevertheless, I offer the following comments on the issue.

- I would prefer that the Federal Government bear the entire cost of the development of a new visitor center.

- The suggestive partnership between the Park and the "foundation" (Kinsley Proposal) is acceptable if the alternative is no new center.

- The removal of the present Cyclorama building and the protection and restoration of the painting is necessary. The Park should remove the present building and restore the land to its 1863 appearance. A new home for the painting and the addition of its foreground (like the Atlanta Cyclorama) would be great.

- The revised proposal for the new visitor's center is a much better plan than the original.

- The visitor center should use new technology for its interpretative exhibits and move away from the static displays so common to museums. Capturing this generation requires computer technology not gun racks. The youth we interest today are the visitor's who walk the field's decades from now, something the tourism industry must understand.

- A new library and research area for the use of the archival and library materials is provided for, the present condition is deplorable.

- Ranger programs and the Licensed Battlefield Guides programs are worldclass operations and need expansion.

Finally, let me again thank you for the opportunity to participate in the review of the "Draft Plan." If there is anything further that I can do to help out, please feel free to contact me. I look forward to seeing the "Park" move forward on this plan and will make my wishes clear to my elected representatives. Keep up the excellent work.

Sincerely,

Michael V. Redding

## COMMENTS

**Dear Dr. Latschar,**

It's very important that the General Management Plan move forward. We appreciate the opportunity to be heard.

Sincerely,

Name Myra R Reichart

Address

## RESPONSES

**Myra R. Reichart**

Carolyn Sue Reigle

**Dear Dr. Latschar,**

It is vitally important to the preservation & protection of our Gettysburg heritage that the General Management Plan move forward. Thank you for the opportunity to be heard!

Sincerely,

Name Carolyn Sue Reigle

Address

## COMMENTS

Dear Dr. Latschar,

It is very important that the General management plan move positively forward for Gettysburg Battlefield heritage museum

Sincerely,

Name William R. Reinhart

Address

## RESPONSES

William R. Reinhart

## Benjamin Resnick

GAI CONSULTANTS

GAI Consultants

October 12, 1998

Project 92-549; 93-412

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325-2998

*Draft General Management Plan and*
*Environmental Impact Statement*
*Gettysburg National Military Park, Pennsylvania*

Dear Dr. Latschar:

Thank you for sending a copy of the *Draft*, General Management Plan and Environmental Impact Statement (GMP), Gettysburg National Military Park. We at GAI Consultants, Inc. (GAI) read it with great interest and enthusiasm and are forwarding our comments herein. First and foremost, we would like to congratulate the National Park Service on the preparation of a comprehensive and well written document. The Cultural Resources Group at GAI fully supports the Proposed Plan (Alternative C), as detailed in the GMP, and applauds Gettysburg National Military Park (NMP) for acknowledging the importance of the long-term preservation of its significant archives and collections.

GAI is truly fortunate to have had the opportunity to work with the Park in its efforts to document its cultural resources over the last several years. Based on our experience, we believe that Kristen Stevens, Gettysburg NMP archeologist, has steadfastly contributed to the accomplishment of one of the Park's four mission goals: the preservation and interpretation of archeological sites and artifacts.

We compliment the Park's continued efforts toward conscientious preservation of its cultural resources and enthusiastically agree with the GMP that any ground-disturbing impacts related to the proposed plan be preceded by an archeological survey under Section 106 of the National Historic Preservation Act. Our experience and knowledge of the Park's cultural resources affirms our belief that many unrecorded archeological resources remain throughout Gettysburg NMP as indicated in the GMP.

Sincerely,
GAI Consultants, Inc.

Benjamin Resnick
Archeology Manager

BR:br

Pittsburgh, PA | Charleston, WV Orlando, FL | Philadelphia, PA | Ft. Wayne, IN Boone, NC | Viña del Mar, Chile

## COMMENTS

October 14, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

The enclosed written comments will extend and add to the verbal remarks I made publicly for the record on October 1, 1998, at the Public Comment meeting held at the Cyclorama Auditorium. These written comments are submitted for the written record of comments, and reflect further study of the Draft General Management Plan, and further maturation of personal views regarding the GMP proposal.

It is hoped that these comments will receive the attention and careful review that reflect the attention and care given to their development. I believe they are in keeping with the consideration and openness of all of the meetings on this controversial proposal. Please accept my appreciation for the opportunity to comment.

Sincerely,

Conrad B. Richter, VMD

## RESPONSES

### Conrad B. Richter

COMMENTS ON THE GMP

a COMMENT #1. *The Draft states on p76 that "All public activities are systematically evaluated for appropriateness before they are permitted" (on the Battlefield). Further: "Use NPS criteria to determine if and when uses are compatible".* These criteria do not appear in the Draft, and I urge that these criteria be published if they are not already, and be readily available to the public. It is hoped that these criteria will be further reviewed and where necessary revised to ensure that any use of the Battlefield for any purpose other than study; observation; solemn remembrance; and such related activities as these, be stringently restricted or prohibited entirely. The NPS must make every effort to preserve the consecrated environment created by President Lincoln's address, and categorically avoid or prohibit activities that make the monumental sacrifice of those who fought to preserve the Union and the country seemingly trivial. It is for these purposes that the Gettysburg National Military Park exists. Encroachment on this sacred trust is demeaning to the heroes who sacrificed here.

b COMMENT #2. *The public awaits with certain trepidation, the design and construction of a new visitors' center and its outlying buildings.* It is deemed imperative that the quality of construction of new buildings be such that they are timeless and ageless in their visual impact and structural characteristics. Furthermore, it is deemed imperative that these buildings reflect the period architecture and building materials characteristic of the time (1863) for this specific region of the United States. It is specifically urged that the buildings not be architecturally unique or attempt to break architectural "new ground", or that they be representative examples of a "well known" architect, placed here on the Battlefield as a monument to the architect rather than a monument to the events that took place here. The buildings should be platted and designed to accommodate expansion without compromising the architectural features and its utilitarian nature.

c COMMENT #3. *The proposal for the new Visitors' Center calls for approximately 1700 sq ft floor space for research and the library.* This is deemed to be marginal at the very best. Page 78 of the proposal claims "Gettysburg NMP owns one of the most significant collection [sic] of Civil War artifacts in the United States, and its 350,000+ collection of archives documents the preservation and commemoration of the field". These valuable resources are, in fact, of limited value to scholars and interested parties unless they have access to them, and the facilities to utilize them. Even though current GNMP Administration is opposed to making Gettysburg the focus of Civil War history and studies, and such a stated goal would likely meet much competition, every feasible effort should be made to increase the capabilities of the library and research facilities in this sphere. This is, of course, especially true for the Battle of Gettysburg and the Gettysburg

a The criteria that NSP uses to determine appropriate uses for National Park Service sites can be found in its enabling legislation, regulations, policies and guidelines. In particular the guidance on special park uses and events can be found in the Code of Federal Regulation in 36 CFR Section 2.50 and in our Special Park Use Guideline, NPS-53. In brief, these documents define appropriate park use as an activity that is consistent with the purpose and values for which the park was established and contribute to the visitors' understanding of the park. Gettysburg NMP has applied this criterion in the past and would continue to do so under the proposed alternative. In those cases where an existing use is deemed inappropriate, NPS would work with the local community to find alternative locations for these events.

b Actual design of the proposed museum complex would not begin until after NPS has selected an alternative, the GMP process is complete, and the NPS signs a formal agreement with the Gettysburg National Battlefield Museum Foundation. At that time, in accordance with the Letter of Intent, the Foundation would be responsible for providing a design concept for "facilities that respect their location and the historic vernacular building tradition of the area; respond sympathetically to the natural landscape features of the site; and become a positive catalyst for preservation and a lever for sensitive development of surrounding areas. (draft GMP/EIS, p. 327)

c The 1,700 sq. ft. listed in the draft GMP/EIS on page 89 provides more than the current space occupied by the library in the Cyclorama Center. NPS would provide adequate space to meet the needs of visiting researchers but recognizes that proper design, staffing and scheduling can have major impacts on the actual space needed in this type of facility.

## COMMENTS

Campaign where the collection of records, documents, and artifacts should be second to none. Such enhanced facilities would have positive effects on the local business community as well; scholars and students frequently stay in the community for as much as a week doing their research.

COMMENT #4. *Monumentation Policy. Chapter 2, p75. Under management prescriptions it is stated that "No new monuments are built on the park. Work with groups wishing to construct new monuments to find other ways to meet their goals."* This is a highly sensitive area of Battlefield preservation. Although there is at present a moratorium on monument placement, the current policy (Monument Policy - Gettysburg National Military Park) actually permits the placement of regimental monuments on brigade battle lines as well as advance or secondary position markers. In addition, commemorative memorials are permitted within development subzones identified by the Superintendent of Gettysburg National Military Park. The current policy provides information on procedure for placing such markers and monuments as well as the general review and oversight rules. It is long past time when no further monumentation of any kind be permitted on the Battlefield. A moratorium and the current policy are not enough. The most recent example of the current policy is the unfortunate and artistically unredeeming equestrian statue of Confederate General James Longstreet placed in the Pitzer's Woods Commemorative zone in July 1998. Furthermore, the sculpture of this statue stated in the September meeting of the Gettysburg Civil War Round Table that his next goal was to place a statue of Confederate General John B, Gordon on the Battlefield. The Battle of Gettysburg was not a North-South football game. It was a battle fought by the United States forces to defeat a body in rebellion against the central government to preserve the country, and, as well, to end slavery. I take especial exception to commemorating men who fought to destroy the "Last great hope of mankind", and to preserve slavery. In his book *Here Come the Rebels*, pp144-145, Wilbur Nye documents the rebel squads who searched Western Maryland and Southern Pennsylvania looking for and rounding up blacks, regardless of their status as escaped slave, freedman, free man, or whatever, and tying them together to send back to Virginia to be sold into slavery! Nye also states: "Possibly these acts were not sanctioned by governmental policy (Confederate) or at the various levels of military command; or perhaps for secrecy or other reasons, the orders and reports were oral and carefully guarded. It is hardly credible that troops or commanders were unaware of the situation". We cannot justify commemorating such men, no matter how valorous they fought in a misguided cause. Finally, it is imperative to remember what the Battlefield was commemorated and preserved for in the first place - the victory of the United States forces and its importance to the survival of the nation.

## RESPONSES

COMMENT #5. *Common to all Alternatives is the proposal to: "Limit the type of buses which are allowed on narrow avenues with tight curves to the size that can navigate these conditions without leaving the roadbed".* This proposal is long overdue and requires more emphasis. Very large buses cannot negotiate many of the tight turns which are so common on the Battlefield avenues. Some avenues are too small for them entirely; furthermore, attempting to share the roadway with these large vehicles is impossible for passenger cars in some venues, requiring that the smaller vehicles yield or drive off the paved roadway. In addition, even though signs prohibit bus engine idling at such places as Little Round Top, that prohibition is routinely violated. Such violations destroy the quiet serenity of the venue and fill the air with obnoxious fumes. Strict enforcement of bus idling prohibitions are needed.

COMMENT #6. *Common to all Alternatives is the comment that bicycle traffic is managed to prevent resource damage and/or loss.* This is OK as far as it goes, but it does not go far enough. Some bicycle management is covered in the GNMP "Compendium"; however, the "rules" are not universally known or understood by rangers, and the rules are flawed by lack of public notice of legitimate bicycle traffic procedures. Accordingly, automobile drivers frequently encounter bicycle traffic moving against automobile traffic flow in a single lane. No bicycle traffic should be permitted to move against the flow of auto traffic in one way, single traffic lane patterns. This is dangerous and confrontational. There is no signage anywhere in the Park that announces the current exceptions, and neither bicyclists or auto drivers understand the current "rules". Where bicycle traffic is allowed to move against traffic, it should only be in designated bicycle lanes or paths.

COMMENT #7. *Alternative C states (p 128) that "The features that are significant to the design of the Civil War portion of the Soldiers' National Cemetery are repaired, rehabilitated, restored or reconstructed". The plan proposes to "Restore the original grade and height of Civil War era gravestones. Replace missing Bivouac of the Dead Tablets. Reestablish wisteria and vines on the Rostrum. Reconstruct missing pipe-rail fence, gates and other similar items."* This is laudable, and much of it should be a management target independent of the GMP. Unfortunately, if Alternative C is successful, the current parking lot across Taneytown Road from the Cemetery will no longer be available. Since the Soldiers' National Cemetery is the reason that President Lincoln came to Gettysburg in the first place, and hence the root of his Address, the Cemetery must remain one of the most important venues on the Battlefield. Repeated questions on how the lack of parking near the Cemetery will be addressed, during public comment and discussion meetings, have only produced vague comment from the Superintendent and the Icon Architecture, Inc., consultant. Such considerations as a walk way from the new visitors' center, a shuttle from the same place, and parking on Baltimore St., have been aired, but only vaguely. This is a major

d

d Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new museum complex to the most highly visited sites, including the Soldiers' National Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants.

## COMMENTS

d (cont.) problem that demands a resolution. None of the vague suggestions has appeal, and is likely to be fraught with major problems. A shuttle is schedule dependent and possibly only seasonal, leading to many problems that will interfere with accessiblity and visitation of this most important venue. A walk way will not work for many reasons such as distance, inclement weather, age of visitors, etc. Parking on Baltimore St., offers no serious resolution to the hundreds of visitors that visit this venue. **Until this major problem can be satisfactorily resolved, none of the proposals to relocate the visitors' center can be seriously considered. If some parking facilities approximate to the National Cemetery are necessary to accomplish this end, principal will have to be compromised to achieve this.**

e GENERAL COMMENT. I find many more positive and enlightening prescriptions in this proposal than negative. Nevertheless, I have serious reservations about available resources to maintain some prescriptions, such as fence restoration and woodlot maintenance once these ends are achieved, and I think that estimates on cost to maintain the restored condition are far too low. Dr. Latschar, his staff, and his consultants are to be congratulated on their industry, openness, conduct of the procedures, and innovative proposals. I wish them success.

Respectfully submitted:

Conrad B. Richter, VMD

## RESPONSES

e Overall staffing needed to implement any alternative in the draft GMP/EIS is partially based on the Gettysburg NMP's ability to utilize volunteers to help meet its maintenance requirements. Along with additional maintained areas, several existing areas would be restored to their natural state and would not require the level of maintenance they now receive. Maintaining the additional fencing would be the greatest challenge to the maintenance staff. However, between the additional staff, volunteers, and additional contracting of specific maintenance requirements, NPS believes that it could be accomplished.

October 11, 1998

Congressman Bill Goodling
House of Representatives
Washington, D.C.

a With reference to the ongoing controversy over the Park Plan which the National Park Service is attempting to push thru without considering all that is involved, and certainly without a willingness to acknowledge that, while it isa National Park, it is also home to many of us, and we believe we do have a right to have effective imput.

I allow some other groups to talk about the 39 million dollar visitor center, which, according to the superintendent will not have a restaurant and is not a commercial enterprise--it just has a cafeteria with a seating capacity of over 300!

b What is of grievous concern to me is the proposed destruction of a 576 plot of woodland.
I am very perturbed over this decision by the Park Superintendent to clear 576 acres of woodland. This little tract of land is home to an extremely large bird population, as well as small animals. There is a small flock of bluebirds that somehow managed to survive the extremely deep snows a few years ago--we have been observing them ever since moving to Gettysburg about 10 years ago. We regularly see varieties of woodpeckers, red-headed,hairy, downy, red-bellied, a pair of pileateds call this home--flickers, yellow bellied sapsuckers, white-breasted and red-breasted nuthatches, chickadees, titmouses, brown creepers, thrushes, cardinals, mockingbirds and brown thrashers,warblers, the list could go on and on. There is also a beautiful mass of rock columbine, as well as other plants that will be destroyed by this proposed plan, but I am most of all concerned about the destruction of the habitat for birds. It is general knowledge that the songbird population is decreasing steadily. The loss of even small plots of habitat contributes to this demise.

Although it is a very small tract, there seems to be no legitimate reason for wiping it out, thus decimiating songbirds already on the decrease.

c The claim for the deerkill in the Park was that the deer were destroying this very woodland. Now that the deer have been drastically reduced in numbers, suddenly the Park Superintendent finds it necessary to level this precious woodland "because it wasn't there when the Civil War was being waged".

## Virginia Ricker

a As outlined in Chapter 5, "Consultation and Coordination," of the draft GMP/EIS, NPS has provided numerous opportunities for public input and comment as draft plans were formulated. In 1995, NPS began considering alternatives for development of collections storage, visitor center and museum facilities. The DCP process included an Environmental Assessment with a formal scoping meeting, a formal 30-day review period for the scoping documents, 2 sets of subsequent public workshops, the release of a draft DCP/EA evaluating 4 alternatives and a 45-day public review period.

During the development of the draft GMP/EIS, four newsletters and an informational mailing on the proposed museum complex were sent to the 3,800 people on the GMP mailing list. In response, NPS received more than 3,300 comments, including 960 individual letters and more than 2,800 responses to questionnaires or newsletters. The public responses substantially influenced both the GMP alternatives as presented, and NPS negotiations on the museum proposal.

As a part of the GMP process, NPS conducted 30 public workshops, open houses, or hearings, including 6 presentation/ question and answer workshops during the formal 60-day public comment period on the draft GMP/EIS. Over 500 public comments were received during the formal public review period.

b You are correct in stating that the wooded areas of the park provide habitat for a variety of wildlife species including many neotropical migrant birds. The plan does not call for the complete removal of all wooded areas on the park, only areas that were not wooded in 1863. The areas proposed for tree removal would be revegetated and they in turn would provide habitat for a different group of birds such as northern harriers (marsh hawks), short-eared owls, upland sandpipers, bobolinks, and other birds that use grasslands for their breeding grounds and migratory stopovers. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed threatened or endangered species.

## COMMENTS

I recall about 2 years ago, walking thru the Park, when workers were busily engaged in taking down a fairly large tree, larger than most--there are not a lot of large trees there. It was obviously sound, so I asked what was the reason for its removal. One of the workers said it had to go because it was not there at the time of the Civil War. My next question was, "and are you also going to replace every tree that was here during the war, but has since died or been removed?"

Some comments have it that the reason for both the deerkill and the shaving off of the woodland is to appease the farmers who want to plant corn. I've been told this is not historically compatible with the region during the Civil War period.

d I can't help wondering--who pays for this massive wood-cutting operation, who benefits from the sale of the wood, and how is it that tourists by the thousands each year absorb the history of the battlefield without complaining or being hampered by the fact that the trees, shrubs and bushes just may not be exactly as during the Civil War. Do they come to study the placement of trees, or the placement of memorials and statues, historical plaques, the Devil's Den and sites of the battles? Why, they actually enjoy strolling thru the woods!

Of course, the loss of this woodland in addition to decimating the bird population, would also be grievous to the citizens who populate this area, who frequent the park for its esthetic value--but then, Gettysburg residents are not to be involved in all of this. The Superintendent prefers to take his show to Pittsburgh, where people are, doubtless, better acquainted with and more concerned about this national treasure than those living here.

I am happy that you have been involved in the Park matter, but would surely appreciate investigation as to the "why" of the proposed eradication of the woodland. As pointed out above, there is serious contradiction in the reasoning set forth by this Park Superintendent. He does seem to feel this is his little kingdom, and his attitude towards the people in this county is something less than considerate or courteous.

Thank you for your interest. Please exert every effort to prevent this action by the Superintendent.

Thank you for your time.

Sincerely,

Virginia Ricker

Virginia Ricker

## RESPONSES

c The objective of the white-tailed deer management plan is to protect the historic battle landscape from the adverse affects of over browsing by deer. One of the goals of the action alternatives in the draft GMP/EIS is to rehabilitate the historic battle landscape of the park. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/EIS and the draft GMP/EIS would remain as part of the historic battle landscape.

d The cost estimates for tree removal are high because of the care the NPS would take to minimize the impacts to the park resources and the environment. The park would use best management practices and would phase large projects in order to reduce the effects of cutting. In addition, the type and quantity of trees to be cut has yet to be determined. Therefore, no value for those trees can be estimated. Consequently, the cost estimates for tree removal are calculated with a standard fee on a per acre basis. As implementation plans are developed, the costs could be reduced though the use of partnerships, cooperative agreements, or the use of volunteers.

NPS visitor surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help the park meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive rangers are frequently asked if the battlefield landscape looks as it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible. That is why each of the action alternatives suggests some level of vegetation removal.

Robert L. Ridgway

Dear Dr. Latschar,

Appreciate the opportunity to be heard on the subject of the General Management Plan at the Gettysburg Battle Field. I hope this planning moves forward to completion.

Sincerely,

Name Dr Robert L. Ridgway

Address

## COMMENTS

From: Self <der>
To: GETT-Superintendent@nps.gov
Subject: Renovation Plans for Gettysburg
Copies to: der
Send reply to: der
Date sent: Tue, 8 Sep 1998 13:38:49 -500

Dear Mr. Latschar,

Yesterday an article was in our local newspaper, the Lancaster New Era, entitled "Hallowed ground at Gettysburg will be returned to its historical honor." My husband and I read this article with interest, as we love visiting Gettysburg, and in fact have been there about 20 times since 1975. It is our "get-away" spot, being so close, and we are also interested in history and genealogy.

While we can understand the need to store things in a better climate controlled environment, keep original monuments in good shape, etc., we enjoy Gettysburg, just as it is.

a One of the suggestions we would oppose is the shuttle bus to control traffic problems. As previously mentioned, we visit Gettysburg frequently, and we have only seen heavy traffic problems during the Heritage week - last week of June through July 4, and most likely during the commemoration of the Gettysburg address. (the one time of year when we have not been to Gettysburg) One of our most enjoyable "pursuits" is driving through the park in our own car, stopping at leisure to check out the various monuments and other sites. We never tire of it, and always find something new, as each of us has ancestors who fought in a Civil War regiment at Gettysburg. There has only been one time when my husband and I took a bus tour - the rest of the time we prefer to drive in our car.

In the article we read, there were two opposing statements and I quote:

"Our biggest competition in the tourist industry are places like Hersheypark that are updated every year. If we don't upgrade our facilities, we'll lose more and more people to places like Hersheypark." And then there was this statement:

"Ten years ago, we had 1.2 million visitors - last year we had 1.8 million, says Lawhon. We're being loved to death."

First, then, it doesn't sound like you are losing visitors, but rather gaining visitors. Secondly, there is no comparison of Hersheypark(we are very close to that park) and Gettysburg. Being a genealogist, I know that you will attract an entirely different type of tourist to Gettysburg. Hersheypark is an entirely different type of tourist attraction, as is a beach or the mountains. Different personalities with different interests go to each of these places. I, myself, am not a beach person or an amusement park person. I love all things historical, such as Gettysburg or Williamsburg. We visited the beach when our children were younger, but no longer. Interestingly, as they are now 19 and 22, neither one is



## RESPONSES

### Donna E. Ristenbatt

a None of the action alternatives would prevent visitors from using their cars to tour the battlefield. In order to provide access to places on the battlefield where traffic congestion is creating problems, the draft GMP/EIS does suggest limited and seasonal restrictions on vehicular traffic on certain avenues. However, those would only be imposed when heavy traffic congestion and gridlock at popular places on the battlefield threatens to make visitor access difficult or impossible. When that occurs, the draft GMP/EIS suggests that alternate transportation in the form of a shuttle would be available to ensure that visitors could access all points of the battlefield. Visitors would not be required to use a licensed battlefield guide. No avenues would be eliminated as a result of any of the draft GMP/EIS alternatives.

interested much in beach going or in amusement park visiting. I believe you need to do a better study on that one.

As a genealogist, one thing that I *would* appreciate is a computerized database of the various Civil War veterans, available at your park, in order for people to research their ancestors. I have heard talk about such a thing and would greatly appreciate that type of contribution at the National Military Parks.

Finally, I am not a avid environmentalist, but if the park is going to get rid of trees to enhance a more original appearance, I do hope it will put these trees to good use. I do not like to see good trees destroyed uselessly.

Since the park is encouraging community opinion, I am sharing the above opinions as per this newspaper article. I would also like to mention that I very much enjoyed the shows on PCN July 1, 2 and 3. They were excellent and Tom Hollbrook (sp.?) is one of your most enthusiastic and superb park rangers. He did an wonderful job explaining Pickett's Charge. As a former school teacher, I would heartily recommend that he teach history - students would be sitting on the edge of their seats with him in charge of a classroom!

Regards,
Donna E. Ristenbatt

## COMMENTS

## RESPONSES

### H. Michael Roark

ALVARADO INSTITUTE OF PLASTIC & RECONSTRUCTIVE SURGERY

H. MICHAEL ROARK, M.D.
Diplomate, American Board of Plastic Surgery
Diplomate, American Board of Surgery

H. MICHAEL ROARK, M.D.
Director, Alvarado Institute of Plastic & Reconstructive Surgery

Member
American Society of Plastic and Reconstructive Surgeons
Western Society of Plastic Surgeons
Society of Plastic Surgeons
San Diego Society of Plastic Surgeons
California Medical Association
San Diego Medical Society

MICHAEL L. HALLE, M.D.
Clinical Associate Professor
University of California
San Diego

Member
American Society of Plastic and Reconstructive Surgeons
American Society for Reconstructive Microsurgery
Canadian Society of Plastic Surgery
Canadian Hand Society
American Burn Association
American Medical Association
California Medical Association
San Diego Society of Plastic Surgery
San Diego County Medical Society

October 26, 1998

John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17324

Re: General Management Plan for Gettysburg National Military Park

Dear Mr. Latschar:

Thank you for providing me with the document concerning remodeling and expansion of Gettysburg National Military Park. I have thoroughly read your plan and would urge that you support the proposed alternative to the plan. Of concern is the museum proposal calling for the nonprofit foundation to raise funds, construct and operate the facility. I believe the cyclorama painting, maps and touring will help alleviate congestion that is currently experienced in the Park. I am concerned that the plans for the movie will amount to dramatic cost overruns. My understanding is that loans and financial risks will be reduced if the movie, as an interpretive tool, is eliminated.

I truly believe the story of Gettysburg is an essential part of our American heritage and should not be forsaken or in any way denigrated. I urge you to consider the alternative supported by the National Parks and Conservation Association.

Thank you for your consideration.

Sincerely,

H. Michael Roark, M.D., F.R.C.S.(C)

HMR/pmk

Dear Dr. John Latschar,

I am writing to inform you that neither myself nor does any of my family and friends agree or support the future devastating developments on the historic Hunt and Baltimore roads while it is *in* the park's historic boundaries. However, we do support proper housing of all the artifacts, it *should* and *must* be constructed *elsewhere* and *out* of the park's historic boundaries. What happens when congestion occurs? Tourists will be looking for alternative routes, and clogging up other entries to the battlefields. We all truly hope that you can help to fully realize the necessity, love, and devotion for our National Park's historic heritage at Gettysburg, Pennsylvania.

*P.S. If there is bound to be a new (another) "TOURIST" facility, shouldn't we recognize how other park services assist their tourists to model for our own? Such as the inventive system modeling "Harper's Ferry" for example, that is, establishing a visitors center a mile off the historic grounds with all the accommodations provided with a shuttle service into the "still" preserved battlefields and sites.*

Sincerely,

Ken and Dorothy Roberts





## Ken and Dorothy Roberts

**a** Through study of its landscapes and its history, NPS has prioritized the park's resources according to significance. Resources that contribute to the significance of the park's battle and commemorative landscapes would be preserved, restored, or rehabilitated. As part of this effort, it is NPS's goal to remove and relocate the major visitor services facilities from their present locations, within and immediately adjacent to the Major Battle Action Area of the battlefield. Removal from these sites, where they adversely impact critically important historic landscapes, to a less significant part of the battlefield would enable NPS to rehabilitate resources and landscape features that materially affected the outcome of the battle. Every effort would be made during siting and construction of the proposed new museum facility to protect all contributing and significant historic or archeological resources, including historic views and fields of fire that affected the progress of the battle. Construction of the museum facility at the proposed site should likewise not materially affect traffic patterns or congestion in the area, since the facility would be located in the same general area as the current Visitor and Cyclorama Centers.

**b** The draft GMP/EIS considered the impact on traffic, parking and transit on the surrounding community as a result of the relocation of the park's museum complex. For example, the impact on traffic, parking and transit for the proposal, Alternative C, is discussed on paged 277-278 of the draft. In general, traffic congestion would be reduced on park avenues as a result of better traffic management and shuttles; decreased on Taneytown Road and increased on Baltimore Pike because of the location of the new museum complex, and increased in the Borough of Gettysburg because of the proposed changes to the park tour route.

## COMMENTS

Author. Mike Robinson at NP--INTERNET
Date: 8/29/98 12:27 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Review of General Management Plan & Environmental Impact Sta
---------- Message Contents ---------

Dear Sir,

We are participants in the "Adopt a Site" program and have attended the public hearings on your new General Management Plan. We have just completed review of the August 1998 Draft General Management Plan and Environmental Impact Statemant and are pleased to offer our unqualified statement of support of alternative C. We feel this alternative will offer both the dedicated historian and the casual tourist the best possible Gettysburg experience.

As one who first visited Gettysburg over forty years ago, I found the draft to be informative as to your reasoning on the selection, the impact it will have on today's park, and most interestingly, the historic perspective of the field of battle (particularly the collection of maps). We look forward to your progress on this worthy goal. We look forward to retoring the landscape to its 1863 appearance and hope we will be able to participate in the undertaking.

You have done your homework well. Keep up the good work and keep us informed.

Sincerely,
Michael and Peggy Robinson

## RESPONSES

### Michael and Peggy Robinson

Author: (William J Romeo) at NP--INTERNET
Date: 9/10/98 12:26 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Plan for new visitor center/museum at GNMP
---------- Message Contents ---

Dear Dr. Latschar:

Having read over the Draft Gen'l Mgmt. Plan and Environmental Impact Statement for the Gettysburg National Military Park, I wish to express my support for Alternative C, which would serve to (a)preserve the battlefield land, (b) restore significant historical areas to a condition more closely in line with the way they existed at the time of the battle, thereby increasing the educational and research value of the park, (c) preserve the museum collection and cyclorama painting from damage and deterioration, and (d) provide improved facilities for the park's multitude of visitors.

I feel that is also important to express my desire to see the Park Service make every effort to mitigate the negative impact of any changes in the park lands on the indigenous wildlife, particularly the white-tailed deer population that suffered under the ill-advised "management" plan of several years ago. With all of the wonderful work that you do, it is disheartening and disappointing when such incidents occur.

Finally, as a middle school educator who has escorted thousands of school children to GNMP and the town of Gettysburg over the past 20 years, I am excited about this visionary proposal by the Park Service and congratulate you, Dr. Latschar, and your staff on the excellent work that you have accomplished in making the park an enjoyable, enlightening and emotionally moving place to visit.

Sincerely,

William J. Romeo, Ph. D.
Educator,
Member, Friends of the National Parks at Gettysburg

## William J. Romeo

## COMMENTS

Subject: GETTYSBURG
Author: Jeffrey Ross
Date: 9/28/98 5:15 PM

9-28-98

Dear Sirs:

a I am vehemently opposed to the proposed commercialization of Gettysburg. Today we need the pure example set by the men who died on that hallowed ground more than ever before.

Respectfully,

Jeffrey R. Ross

## RESPONSES

### Jeffrey R. Ross

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

Author: "kmail" at NP--INTERNET
Date: 8/21/98 6:04 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: comment on plan
---------- Message Contents -----

I register my support for plan C.
I pray that in my life time I could see this
Hallowed Ground as it was; July 1863
Thanks Dr. L and staff for what you do and have
done to further this end.

Chuck Rothlauf

## Chuck Rothlauf

# COMMENTS

C. K. ROULETTE *  *

October 9, 1998

Dr. John Latschar
Superintendent,
National Park at Gettysburg
95 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar;

May I please share some of my wishes with you ?

Before my wishes, however, I'd like to say that I do, indeed, appreciate the extraordinary amount of time you and your associates have put forth to create a plan to both improve the visitor experience and provide protection and display facilities for the NPS artifacts.

Additionally, the following opinions (wishes) are entirely my own and not representative of any organizations with which I am associated.

I have no vested interests locally that might tend to prevent an unhampered opinion.

Here are my wishes:

a I WISH that the visitors center would remain where it is. Not, however, in its present configuration, but in a much lower profile building (less visible from the cemetery, roadways, etc.) This new structure should contain all of the services now provided plus state of the art protection and display for the NPS artifacts, and an auditorium adequately sized and equipped. Please don't overlook an electric map or some similar visual presentation giving the visitor a proper indoctrination. Much of the space could be underground.

b PLEASE DO NOT INCLUDE FOOD SERVICES !

c I WISH that you would NOT remove hundreds of acres of forest which WILL upset the natural habitat for so many of our fur, fin and feathered creatures.

d I submit that the average visitor is not the least bit concerned with which trees were here in July, 1863.

# RESPONSES

## C. K. Roulette

a The NPS considered the rehabilitation of the current visitor center as one of the alternatives in the 1996 *Draft Development Concept Plan/Environmental Assessment for Collections Storage, Visitor and Museum Facilities*, which was made available for a 45-day public review period in April 1996. However, the current visitor center is located on land that was central to the Battle of Gettysburg and is a contemporary intrusion upon the battlefield's historic setting. The NPS' desire to restore the historic setting of the battlefield, coupled with the extremely high costs of rehabilitation of the current building, led the NPS to select a new facility in a more suitable location as its preferred alternative.

b NPS evaluated the impact of the cafeteria-style restaurant in the proposed park museum complex on the local tourist economy. The analysis found that even with the inclusion of food service in the park museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility will offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

PAGE TWO 10/9/98

e I WISH you would not go to the expense of demolishing the Cyclorama building (the oil can, as you call it) and rebuilding elsewhere. If it leaks, fix it. If it is an eyesore, plant some more trees.

f I WISH that these projects would be funded with public (taxpayer) dollars. Please let's have no private, commercial enterprises. I wouldn't be a bit surprised if a groundswell of local/regional (maybe even national) support could be mustered to convince congress to allocate the necessary funds - and just think of all the money you've saved by not purchasing new property and removing all those trees !

I WISH you would extend the public comment period to allow time for these as well as other options to be more fully discussed and considered. It must be obvious by now that the 20 plus public sessions already held have not been sufficient to satisfy some very major concerns.

Finally, I WISH that my wishes would become your wishes and that "our" wishes would turn out to be the wishes of others who are involved in the decision making process.

Sincerely and respectfully,

C. K. "Kib" Roulette

c The plan alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that were considered in the draft GMP/EIS. The non-removal of trees favor forest species, most of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed threatened or endangered species.

The process by which trees may be removed would vary depending on the site. Best management practices would be applied to all sites to minimize the impact of tree removal on the park and its resources. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. This would have minimal impact on most species because most of the wooded area would be retained. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available to open those areas and maintain them, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas. Cutting during the winter when the ground is frozen would reduce soil erosion and sedimentation in the streams while also not affecting species during their breeding seasons. Seeding and the planting of native plants as soon as possible after the cutting would also reduce erosion and help prevent the establishment of non-native species.

d NPS surveys and professional experience suggests that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the

| COMMENTS | RESPONSES |
|---|---|
| | fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive rangers are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible. |
| | e The structural and mechanical deficiencies of the Cyclorama building were generally described in the draft GMP/EIS on pages 13, 17, and 18. NPS is reluctant to authorize more expenditures for a building whose location is inappropriate. NPS is committed to rehabilitating areas of the battlefield where significant conflicts and battle losses occurred. For many decades NPS has been acquiring private properties within these major battle action areas to remove physical developments and activities that intrude upon its historic landscapes and diminish the visitor experience. |
| | f In January of 1998, the Director of the NPS testified to Congress that there was a maintenance and construction backlog of $5.6 billion needed for critical repairs to historic structures, visitor facilities, and utility systems throughout the National Park System. At 1998 levels of funding for the NPS, it would take over a third of a century to fix everything which is currently broken in the National Parks. Congress did provide additional funding to help resolve this problem in 1999. Simultaneously, the NPS is seeking appropriate ways and means to solve part of this nation-wide problem, through public-private partnerships. |

Author: "James Rouse"
Date: 10/19/98 9:02 AM
TO: GETT Public Affairs Office at NP-GETT
Subject: Gettysburgh General Management Plan
-------- ---------- Message Contents ----------

a The GMP is well prepared and I endorse the proposed action. The only aspect that I am not in favor with is the role of the private enterprise to devolope and operate the visitor center. (There is no such thing as a FREE LUNCH, and the plan did not spell out what the private developer would be expected to gain in this venture). If this was indicated in the plan, I failed to find it.

I still believe that it is still the role of our Government (Public funds) to build public use faacilities in our National Parks.

The relocation of the Visitor Center and use services to another site less critical to the historic moment of that battle, is a much needed move. The other natural resource restoration plans to recreate a more historical setting is also a good move.

I apologize for the tardiness in my response, but time and travels prevented getting you anything earlier.

Thanks for the plan, and I hope to be on your future mailing list.

James S. Rouse
(Ret. NPS Planner and Manager)





## James S. Rouse

a To the question regarding any potential sources of gain to the Kinsley Construction, Inc., Robert Kinsley or the Kinsley family, Mr. Kinsley has provided this response. "My proposal was to create a non-profit 501 (c) (3) foundation, the Gettysburg National Battlefield Museum Foundation, which would be the "developer" of the project. This would enable contributions to be made to the Foundation that would be tax-deductible by the donor. The Foundation would have a national board of directors comprised of representatives from the business, financial, educational, and historical communities. I hope to serve on the board of directors. The board of directors would be formed after the General Management Planning process is completed and the definitive agreement between the Park Service and the Foundation is finalized. The operation of the visitor center and museum will not result in any economic benefit to me, as all net proceeds realized by the Foundation from operations will inure to the benefit of the NPS. I will also have no financial interest in any of the entities operating within the visitor center, such as the tour companies, the film theater, the food service or any book or museum store.

"I am Chairman and Chief Executive Officer of Kinsley Construction, Inc., a regional construction contracting company that I started over thirty-five years ago. Kinsley Construction has averaged annual construction volume of $150 million over the past several years. We hope that the Foundation's board of directors will select Kinsley Construction to manage the construction of the visitor center project, however that decision ultimately will be made by the board of directors after it is formed. As construction manager, Kinsley construction would manage competitive bidding of all contracts for construction. The construction cost of the project is approximately $22 million. If the board of directors decides that it is in the best interest of the Foundation and its purposes to select Kinsley Construction to be the construction manager for the project, we envision that Kinsley Construction would be paid a construction management fee competitively priced with fees typically charged on similar construction management projects.

"To date, Kinsley Equities, a Kinsley family partnership, has provided all the seed money for this project, without any guarantee that any of it will be returned. You should also know that the Kinsley Family Foundation has donated a grant in the amount of $2 million to the Gettysburg National Battlefield Museum Foundation in order to complete the purchase of the site

| COMMENTS | RESPONSES |
| --- | --- |
| | for the proposed museum and visitor center. To date, prior to signing an agreement with Park Service, Kinsley Equities and the Kinsley Family Foundation have provided the Gettysburg National Battlefield Museum Foundation approximately $3.5 million, to acquire the Levan site and the RV site and to fund all the studies that have been required, including wetlands, endangered species, archeological and traffic studies. That amount also includes site planning performed to date by LSC Design, Inc., an architectural and engineering company primarily owned by the Kinsley family. All other start-up expenses, including costs involved in the public relations efforts and the cost of Kinsley Construction personnel devoted to the planning of the project prior to the agreement with the NPS, have been borne by Kinsley Construction and will not be reimbursed.<br><br>"After the fundraising is completed, including the establishment of a mechanism to ensure creation of an endowment for ongoing funding needs, the construction of the museum and visitor center project is complete, and operations commence successfully, it is likely that I will have considered my mission accomplished and would step aside for others to continue this good work. I will have no financial interest other than what has been explained in this letter."<br><br>This information was released to the public during the GMP planning process. |

Tara E. Santmire

October 13, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Rd.
Gettysburg, PA 17325

Dear Mr. Latschar,

I am writing to you concerning the role of and plan for equestrian trails in Gettysburg National Military Park

My husband and I are avid trail riders. We never even considered visiting the park until we became aware of the equestrian trail system that was available there. We are not the only riders by far from Virginia that come to enjoy the park through its equestrian trail system. I think that many of these individuals would not come to the park or would not come repeatedly if it were not for the equestrian trail system.

I am not sure what your goals are for the park, but I would assume that two of those goals are preservation of the historical nature of the site and dissemination of information about the battle of Gettysburg. Equestrian trails do not impinge upon the preservation of the site if they are properly maintained. There need not be erosion or other environmental problems, but this does require proper maintenance and construction of equestrian trails. In addition, equestrians add to efforts of site preservation in two ways The first is that the presence of equestrians reminds us all of the role of horses both at Gettysburg and elsewhere during the Civil War. The second is that equestrians are much more likely to make contributions of money and time for the support of the park if there continues to be an extensive set of equestrian trails that allows the equestrians to visit the park including areas of historical significance. In addition, if such trails do not exist and equestrians do not visit the park, then you lose a large group of people from your audience. If you can't get them to come to the park, then you can't tell them about all of the fascinating things that happened there.

I hope that you will consider these comments and continue to incorporate an extensive set of equestrian trails in the park that allows equestrians to visit the historic sites in the park.

Sincerely,

Tara E. Santmire

Tara E. Santmire

## Tara E. Santmire

# COMMENTS

TO: Superintendent John A. Latschar

Is There NO End To Your Ego
Ruin The Greatest Place on Earth? I Have Been Going
To Gettysburg Since 1967 and Have Seen Many Changes.
Some were Good, Like The Removal of The Peace Light Inn,
The Sheraton Motel, The Texaco Station near Pickett Charge and other
Private Business' from The Battlefield. Some NOT So Good, Does
The Railroad Cut ring a Bell? However your Grand Plan
for a New Visitors Center and Removal of Some Roads Thru The
Park Have Got To Be The worse Set. I Have been Going To The
Park for 31 years now and Have never had a Problem with The Visitors
Center either at The Cyclorama Site or when They moved To The Electric Avenue
Site. As far as The Eliminating of Some Roads, Everyone does not need a
Guide on The Bus Tour, Some of us like To Take our Time and Take The
Park at our own Speed, Why should we Have Some Big Roads (Such
as To Northern one) Eliminated! There Is No Place I Have Ever Been
I Enjoy more than Gettysburg, Each Time I Come (I come 2-
3 Times A year) I wonder what will Change In The Future!
Please Think long and Hard, as Everything you
Do will be There long After you Have made our To Bigger and
Better things. It Is us, The People who Come To (and Support)
The Park Years after you who will Suffer. In My Opinion you are
no Better than the Carpetbaggers who Filled the South after the war.
I am In Constant Contact with my Representative In D.C.
on this matter. Do The right Thing, or Do us a Favor Move
on now Before this Great Park Is only fit as a Memory! Thank you
for your Time and Please feel free To Respond!

Anthony Sapia

# RESPONSES

## Anthony Sapia

a In order to provide access to important points of the battlefield, the draft GMP/EIS does suggest limited and seasonal restrictions on vehicular traffic on certain avenues. However, those restrictions would only be imposed when heavy traffic congestion and potential gridlock at popular places on the battlefield threatens to make visitor access difficult or impossible. When that occurs, the draft GMP/EIS suggests that alternate transportation would be available to ensure that visitors could access all points of the battlefield. Visitors would not be required to use a licensed battlefield guide. No avenues would be eliminated as a result of any of the GMP alternatives.

10-15-98

My Husband and I are very much in favor of relocating the visitor center and cyclorama building. This really is hallowed ground, and deserves to be preserved as it was during the battle. We visit Gettysburg yearly, and are repeatedly "moved" by the overwhelming sacrifice our ancestors made here. Please restore this sacred ground by removing these structures.

Albert and Barbara Sarvey

**Albert and Barbara Sarvey**

## COMMENTS

Sept 25, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Mr. Latschar:

All of my professional, business, and personal friends oppose Department of Interior plans to involve a private developer for building visitor center and museum at Gettysburg National Military Park. This park is a heritage belonging to all Americans. It commemorates a crucial time in our nation's history.

If our Federal leaders appeal directly to the American Public for the funds to restore this national shrine in particular and other national parks in general, they will find that we have it in our hearts to respond generously.

a Please do not commercialize what we hold sacred.

Yours sincerely,
Martin Sax

## RESPONSES

### Martin Sax

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

**Dear Dr. Latschar,**

I urge that the General Management Plan be forwarded with all due speed. I feel this plan is essential to the long term endurement and understanding of the Gettysburg National Park and the epic struggle that took place there. Therefore it is important to this nation.

Sincerely,

Name Robert Schafer

Address

Robert Schafer

pol-tic3 October, 2, 1998

Director,
National Park Service
POBox 37127
Washington, DC, 20013

This letter concerns happenings at the Gettysburg National Military Park and the effects of those happenings on both future visitors and the residents of the area.

There are four enclosures which effectively define both the problem and the public's reaction to that. Those enclosures include
1: The "Draft General Management Plan/Environmental Impact Statement"
2: A Headline article titled "NPS plans to cut 576 acres of Trees"
3 My letter to Senator Arlen Spector with Letter to the Editor on back side of letter.
4: An Editorial entitled "Another Sad Day at Gettysburg"

The problem is a plan by the NPS to "restore the Battlefield to its 1863 condition" where this plan involves the removal of 576 acres or approximately 300,000 trees as they go about their concept of "restoration" Others question whether the thousands of monuments were there in 1863 or whether they, too, should be removed along with the roads, the Visitor's Center and, perhaps, the Park Management.

a My question to the National Park Headquarters in Washington is: Is all of this happening with the authority of and support of the Director of the NPS or is all of this a local park service management running amuck without authority or oversight??

Since October 17th seems to be a deadline, your response to this issue must be prompt; not to me, but to the Gettysburg Park Management.

Sincerely,

Fred L. Schaff

## Fred L. Schaff

a The draft GMP/EIS was approved for printing and public review by the Regional Director of the Northeast Region of the National Park Service, and by the Director of the NPS. The draft plan for Gettysburg NMP is the NPS proposal for the best way to accomplish the park's long-term mission of preserving its historic resources and providing for public access and enjoyment.

## Louis B. & Betty Scharon

August 17, 1998

The Honorable J. Hansen
United States House of Representitives
2466 RHOB
Washington, DC 20510

Dear Representitive Hansen,

As very interested citizens in the welfare of the Gettysburg National Park, Gettysburg, Pennsylvania, I am asking you to do whatever is necessary to allow the GNP to move ahead with the plans that have been submitted for the proposed New Visitor Center/Museum Complex.

After many hours, over several years, of citizen participation in planning for this project, we feel it is at the point of becoming a reality. Justifying any project, especially one of this magnitude, sometimes becomes a real problem. However, in this case justification stares one right in the face. The conditions that surround hundreds of priceless, one of a kind artifacts is all the justification one needs. To say nothing of the hallowed ground whose dignity will be restored when this project is complete. If there was ever a win-win situation, this is it.

Thanking you for your support, we remain,

Respectfully,

Louis and Betty Scharon
Louis & Betty Scharon

cc: Dr. J. Latscher, Supt. GNP

"Friends" National Park, Gettysburg

## COMMENTS

**Dear Dr. Latschar,**

Having read the GMP/EIS, I strongly support your proposal. I found the plan well thought out and very easy to follow. Congratulations to you and your staff for the fine work you are doing.

Sincerely,

Name GARY SCHNEIDER

Address

## RESPONSES

**Gary Schneider**

Dear Dr. Latschar,

Thank-you, for all you've done, so far, to help keep GNMP viable for all of us! I appreciate all you're doing to help in keeping the General Management Plan going + forward!

Sincerely,

Name Kathie Schnibben

Address

Kathie Schnibben

## COMMENTS

**Dear Dr. Latschar,**

Dear Sir, I have recently read the proposed GMP. I like the ideas very much. I also think all areas of concern have been addressed. Please move the project forward to make it a reality. Thank you for all your help where the Hydrogis concerned and for letting us tell you our desires. Thank you.

Sincerely,

Name Gail S. Schrack

Address

## RESPONSES

Gail S. Schrack

August 13, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Sir,

I would like to take the time with this letter to offer you a sincere thank you for your support of the Gettysburg New Visitor's Center/ Museum project. I would also like to encourage you to continue the ongoing negotiations for the project, and to finalize it as soon as possible. I like the current proposal that is now on the table. I believe it is the best course of action for Gettysburg, and ask that you encourage your fellow committee members to support this proposal.

Thank you

Gail S. Schrack Gail Schrack

## Gail S. Schrack

# COMMENTS

Dave Searles
President and Historian-Historic Preservationist
AMERICAN HERITAGE SERVICE, INC.

DEDICATED TO THE PRESERVATION OF OUR ARCHITECTURAL, CULTURAL, HISTORIC, AND NATURAL HERITAGE. PROVIDING HISTORICAL SURVEY, RESEARCH, NATIONAL REGISTER NOMINATIONS, CONSULTATION, INTERPRETATION, PUBLIC INTEREST LOBBYING, ENVIRONMENTAL, PHOTOGRAPHY, CONSUMER PROTECTION, AND EDUCATIONAL SERVICES.

October 10, 1998

Dear Superintendent,

I'm writing to comment on the Draft General Management Plan and Environmental Impact Statement. I'm still in the process of reading and studying but the deadline for comment is approaching.

As a historian, I favor Alternative D. As a realist, I believe that Alternative C should be selected. I'm afraid that if Alternative D is selected, the powers to be will never go for it as being to pie in the sky and that we want way to much. We will then be back where we started.

From my experience, if we go with Alternative C, we will be lucky if the powers to be select Alternative B. Always go for one more beyond what you expect to get. Otherwise the powers to be will simply pick Alternative A. Once you obtain Alternative B, then you move on to the next goal, Alternative C. This process takes longer, but you have a better chance of reallizeing your goal in the end. Otherwise, 15 years from now, we will be looking at and debating another draft plan similar to this one.

This is not the first national park area draft plan that I have been asked to review, comment on and select an alternative. The first was the Yosemite National Park Draft Plan of the early to mid-1980s. I choose the alternative now being set in action. It has taken twelve to fifiteen years and a major disaster in the valley to put into place though. If it wasn't for that disaster, that plan would never gone into effect because the powers to be could not afford to have it put into effect. If we had not set our goals so high and worked in steps, it may not have taken a major disaster before it was actually put in action. Since then I have been asked to review, comment on and select an alternative for several other national park areas, as well as national forests.

I have also written a draft plan that we called a historical prospectus and an interpretive guide. This was while I was serving as the Park Specialist-Historian and the George Washington Grist Mill Historical State Park, VA. It was later published, but the powers to be in Virginia never came up with the funding or the will to implement it.

I must commend those that wrote this draft plan. It is well written. It is not to simplistic and it is not to technical. The draft plans that I have studied, commented on and recommended have ranged from what looked like a junior high study project to one being so technical that one would have to have master's degrees in biology, forestry, geology, hydrology, wildlife ecology, etc., to understand what it had to say.

I have one final thought. I believe that the designation national military park should be eliminated. All battlefield areas within the National Park System should be designated as national battlefields, i.e., Gettysburg National Battlefield. Multiple sites, such as those in the Shenandoah Valley, should be designated as national battlefield sites, i.e., Shenandoah Valley National Battlefield Sites.

Thank you for taking the time to consider what I have written.

Sincerely,
Dave Searles
Dave Searles

M.A., History, Washington College, MD, 1992
B.A., Milton College, WI, 1980, History-Political Science major and minors in Criminal Justice and Natural Resources

# RESPONSES

## Dave Searles

MEDTRON
CHICAGO INC.

August 27, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

I am writing this letter to show support and ask for yours for the Gettysburg National Military Park's proposal for the new Visitor Center and Museum Facilities.

As a First Corps member of "The Friends of the National Parks at Gettysburg", I wholeheartedly agree with the proposed Plan (c) of the Gettysburg National Military Park. I need not explain the significance and importance of Gettysburg to you but would like to solicit your support for this proposal so our descendants will also understand the significance and importance Gettysburg has to our heritage.

Thanking you in advance for your consideration of this proposal.

I Remain,
Respectfully Yours,

Medtron Chicago Inc.

David Sedlock

David Sedlock
President

DS:mk

*Instrumentation Specialists*

## David Sedlock

## COMMENTS

Dear Dr. Latschar,

It's important that the General Management Plan moves forward. Please do all that you can to make progress on this project.

Thank you!

Sincerely,

Name Debra Sellers

Address

## RESPONSES

**Debra Sellers**

October 10, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Superintendent Latschar:

In 1889, General Joshua Lawrence Chamberlain predicted that "...reverent men and women...shall come to this deathless field, to ponder and dream..." I am one of those people who have been ensnared by the tantalizing lure of the battlefield. The intrigue the battlefield creates within me has led me to visit that hallowed ground several times each year, in order to both ponder the events of the past and to paint fences and man the Peach Orchard with the FNPG

My frequent visits to Gettysburg over the past three years have enabled me to recognize the significant improvements the GNMP has created this past year. I commend the park on its newly organized system of ranger guided interpretive programs. The brochures outlining the summer's scheduling obtained at the Visitor's Center enabled the visitor to easily plan out their battlefield experience. The newly designed programs, such as the Civilian Walk, provided the visitor with a deeper understanding of the battle Additionally, I was very pleased to see the elimination of the undergrowth on and around the slopes of Little Round Top. It is gratifying to see at least part of the landscape becoming more reflective of what the soldiers experienced in 1863.

As demonstrated by the Draft General Management Plan, the recent improvements to the park are only the beginning. After perusing the plan and talking to several GNMP rangers, I would like to make comments on the following three topics:

1) *Emphasis on the civilian battle experience* As a civilian reenactor, I have taken a great interest in the Battle of Gettysburg as witnessed through the eyes of the innocent bystanders. In the new Visitor's Center and Museum, it is my hope that more space will be allocated towards the interpretation of the civilian experience. This could include utilizing civilian quotes or individual personal narratives ( such as those of Tillie Pierce or Salome Myers Stewart ) that compliment the artifacts already displayed in the current Visitor's Center. Modern tourists are themselves civilians, so delineating the Gettysburg civilians' experience provides them with a link to the past that they can more readily grasp and understand.

a 2) *Limit the access to the horse trails along the most significant portions of the battlefield* In a recent Pickett's Charge ranger-led battle walk, I was dismayed to see the destruction of the fields caused by the commercial utilization of the horse trails It

## Jennifer Shaw

a The draft GMP/EIS proposes the removal of existing non-historic horse trails from major battle action areas, where they are causing erosion and severe resource damage. Horse trails would be moved to existing and rehabilitated historic farm lanes. This would reduce the resource damage problems associated with the existing horse trails.

## COMMENTS

seems that these groups should have limited and restricted access to the trails so that further erosion may be halted.

b 3) *Work on obtaining the unsightly National Tower and destroy it* Although I realize this suggestion may not be feasible at the present time, I urge the GNMP to work towards removing the ghastly intrusion of the National Tower from the peaceful serenity of the landscape. The omnipresent nature of this modern obscenity robs the battlefield of the dignity and respect that our heroes deserve.

In sum, it is very gratifying to witness the progress towards restoring the battlefield to its war time appearance. In 1863, thousands of Union boys felt it was their duty to preserve the nation. Today, it is our duty to preserve their memory.

Sincerely yours,

Jennifer Shaw

Jennifer Shaw

## RESPONSES

b It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." The final GMP/EIS has been revised to note this acquisition priority.

SLIPPERY ROCK UNIVERSITY

September 29, 1998

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
Gettysburg, PA 17325

Dear Dr. Latschar,

Enjoyed meeting you at the Pittsburgh meeting last week. You and your staff did a superb job in explaining the proposed management plan and responding to questions. Thanks for an informative evening. My students also gained a beneficial insight regarding the management planning process.

In regards to the plan, I do have a couple of concerns I wish to pass along to you. (By the way, a relative of mine was wounded in Pickett's Charge – he was in Company "G" of the 18 VA Infantry; another relative was in company "A" of the 5 VA Infantry.)

a

1. My first concern lies with the maintenance of vehicular traffic within the park. It seems to me if we are going to expend so much effort to restore the battle landscape, the presence of automobiles, etc. will significantly erode the value derived from the restoration of the vegetative and cultural features. The problem with private vehicles along the park roads would continue and potentially increase due to the anticipated increase in visitation. Roadside parking, congestion, etc., it seems to me, would continue to hamper the flow of traffic through the park. (Perhaps even making it difficult for the "people movers" to move.) I recommend you consider a phase-out of personal vehicles on the major battle feature roads and replace them with other, more compatible forms of people moving.

2. The best way to experience the park is by foot or perhaps on horseback or horse drawn wagon. Using these alternatives, while fraught with challenges, would be in keeping with the goal of restoring the battle landscape so visitors can secure a better appreciation of the battle landscape and experience the park rather than simply motor through it.

   A hiking trail could be established to join the park's battle areas and Gettysburg's features. A suitably located campground could be established (preferably adjacent to the park on private land) for the hikers. The trail would start at the Visitor Center and wind its way through the battlefield arriving at the campground after a day's hike. A second day hike would

SLIPPERY ROCK UNIVERSITY OF PENNSYLVANIA of the STATE SYSTEM of HIGHER EDUCATION

## J. W. Shiner

a. One of the early alternatives included the possibility of establishing some traffic-free zones in each of the three days battle areas; another suggested that a mandatory park-wide shuttle system be instituted. These ideas were eliminated from further consideration because many reviewers felt they were too restrictive and placed undue importance on select areas of the battlefield. There are provisions in the preferred alternative to establish alternative transportation systems and to close seasonally certain avenues to reduce traffic gridlock and to provide for a more contemplative visitor experience.

## COMMENTS

complete the tour ending at the Visitor Center. Transportation to and from the campground and to and from the visitor center could be provided (again by private enterprise) for the convenience of the hiker-campers.

A horse trail and wagon trail could replace the current vehicle roads within the viewshed of the park's battle areas (to the extent possible). Again, these recommendations would seem to be more in keeping with the goal to restore the battle landscape and to enhance the visitor experience.

3. A third concern centers on the process to create and maintain the restored vegetation on the battlefield.

b a. If I heard you correctly, the plan is to remove 550 acres of current woodland and restore about one-half or less of woodland present at the time of the battle, but subsequently removed, giving a net loss of woodland to the area of +/- 300 acres. A plan to replace this woodland acreage (on or off the park) would be in keeping with the park service's environmental mission.

b. The restoration and maintenance of the battle landscape will be a costly affair. Due to the nature of vegetation, it will be very difficult to create and to maintain the vegetation conditions present in July 1863. The dynamics of natural systems will be difficult to contain and continual maintenance and restoration efforts will be required. I certainly have mixed feelings regarding this for I would really like to view the battlefield as my relative did as he emerged from the woods on Seminary Ridge looking across to Cemetery Ridge. But, my ecological and resource

c management background requires me to view this with an eye to what the consequences will be should we attempt to create a static landscape.

4. Can the park really accommodate additional visitation without an acceleration of the deterioration that currently exists? More visitors, unfortunately, means more depreciative behavior and more "wear and tear" on the park resources.

d Maintaining vehicular access will lead to continuing problems associated therewith. While I concur that as many citizens as possible (and foreign guests, as well) experience Gettysburg, I feel the reality is that additional visitation will be detrimental to both the visitor experience and the park's resources. I'm not sure the plan adequately addresses this inevitability or its consequences.

5. The dependence on volunteers to accomplish restoration and maintenance tasks must be tempered with a realization that such efforts tend to diminish over time. Past experience tends to indicate that while great things can be accomplished by volunteers, it frequently falls to the agency to pick up the



## RESPONSES

b Thank you for your suggestion. If an alternative that requires removal of vegetation is chosen by NPS, the park would work with its neighbors and partners to look for opportunities to assist in re-vegetation projects outside the park boundaries to help establish wooded areas that would not impact the historic landscape.

c NPS policy (NPS 77, 2:2) states that "The purposes of vegetation management are as diverse as the National Park System itself, ranging from perpetuating natural processes in natural zones to conserving the historic values of cultural zones...." Vegetation management is defined as the maintenance, establishment, or restoration of target vegetation that meets a park's management objectives. This may include an objective to preserve a historic site at a point in time in which periodic intervention may be required to counteract natural successional processes (NPS 77, 2:5) as is the case at Gettysburg National Military Park.

The draft GMP/EIS does not call for restoration of the exact vegetation conditions in 1863, but rather suggests the appearance of the broad landscape and woodlot patterns that were present then should be reinstated. The action alternatives in the draft GMP/EIS call for removing non-historic vegetation and maintaining open areas through mowing, grazing, or use as crop fields, depending on the historic use of the area. The wooded land in the Major Battle Action Resource Areas that were woodlots in 1863 would be managed as woodlots again. This would include a selective cutting regime that would open the canopy and allow the natural regeneration of desired species of trees such as oaks, hickories, and maples. It would also include the removal of exotic species that currently dominate the understory in these areas. Natural succession would be allowed to occur in the wooded areas that would not be managed as woodlots. Thus, the open areas would be under a very intensive and frequent management regime, while woodlots would be under a longer term and less intensive management program, and the other wooded areas would be under normal ecological processes.

d The NPS shares your concerns over high visitation impacts to resource protection and visitor experience here at Gettysburg. The planning team documented a number of concerns and current degradation to resources

long-term maintenance of their efforts. This does not seem to be addressed in the plan.

Thanks for the opportunity to express these concerns. Feel free to contact me should you wish to discuss any of them.

Very truly yours,

Bill

J.W. Shiner, Ph.D.
Professor

and visitor experience in developing the draft GMP/EIS. The draft GMP/EIS looked at a number of potential solutions to these concerns and addressed these in the action alternatives. These solutions include the implementation of a traffic management system, relocation of trails to historic lanes, implementation of alternative transportation systems and opening up new areas of the park to disperse visitor use. In addition to these items, the action alternatives propose that future implementation plans would establish carrying capacities for the most overused sites and sizing parking lots, walkways and other facilities to enforce these limits. When an alternative is chosen by NPS, we look forward to working with individuals and interested groups in developing plans that would ensure long term protection of the resource and an improved visitor experience.

# COMMENTS

GETTYSBURG ENGINEERING CO., INC.

CONSULTING ENGINEERS AND SURVEYORS

BRANSBY W. BUSHEY, P.E.
DEAN A. SHULTZ, P.L.S.

October 3, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

The following review comments of the Draft General Management Plan and Environmental Impact Statement dated August 1998 are my personal opinions and should not be considered the position of any organization which I serve on or any agency which I represent professionally. These comments are based on my review of the above mentioned document and the supplementary Environmental Impact Evaluation study, the Transportation Analysis study, the Assessment of the Soil and Water Impacts study and the Soldiers' National Cemetery study.

**General Comments**

1. The GMP is well prepared with respect to presentation and graphics.
2. The Parks Historical Landscape study (Section 2.2) of past and present landscape features and characteristics is applauded. The maps are accurate and well done. This information was long needed and is an indispensable resource for future planning
3. The concept of recognizing both the 1863 Landscape and the Battlefield Commemorative Period as two separate identities is a great step toward keeping the GNMP in its historical prospective.
4. The need for improvements to the visitor center, museum, cyclorama, and staff and maintenance facilities is recognized.
5. It is also recognized that the GMP is only a plan that will establish a basic management philosophy for future decision making and that additional planning will be required before specific action is taken.
6. As Alternative C is the alternative selected as the proposed plan, the majority of my comments will be based on Alternative C

**Mission Goals - Land and Resources**

a 1. Table 5 (page 74) outlines the propose action to be taken to meet these goal. Table 50 shows the capital cost for the construction of these improvements to be $24,274,998 and Table 47 shows the additional maintenance cost to be $197,121. We question if these goals are financially feasible. Although the Park has been fortunate in receiving an additional one

# RESPONSES

## Dean A. Shultz

a The purpose of the GMP is to define the basic philosophy of park management and provide broad guidance to park managers. A GMP sets direction for resource protection and visitor use actions required to accomplish the park's mission. Park managers use these broad prescriptions to guide the hundreds of smaller decisions that are made over the 10 to 20-year life of the plan. Since availability of specific sources of funds over this time period cannot be predicted, the GMP establishes the goals; it then becomes the responsibility of park managers to seek funds and other assistance from all appropriate sources in order to accomplish those goals. As in the past, the park would continue to emphasize the critical role of volunteers, donations, and grants and funds from outside sources as a means of accomplishing the GMP's objectives.

b The number of additional National Park Service staff required for Alternative B, C and D was calculated by estimating the time needed to accomplish the actions listed for each prescription.

c In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed and should therefore result in a stable farm income.

million dollars a year toward the maintenance of Park, the cost of correct existing problems may not allow any of this money to be used toward the construction of new improvements or their maintenance. What new source of funding will be used to meet these goals?

b 2. The mission goals propose the construction of an additional 39.1 miles of missing fence, managing 278 acres of woodlands, remove 576 acres of woodlands, develop 160 of orchards and restore historical farm lanes. All of these improvements will require perpetual maintenance. Keeping the 576 acres of woodlands cleared will be very costly in its self. The plan also proposes change to the Soldiers' National Cemetery, a new maintenance building along with other improvements at the Fantasyland site and the rehabilitating of significant structures with in the Park. These improvements will also require additional maintenance. Although these improvements would be a great movement toward improving the historical character of the Park, we question if $197,121 will be sufficient to maintain these new improvements.

c 3. The construction of new fences and restoring of old farm lanes will have a significant impact on the 2,028 acres of land now leased for agricultural purpose. The size of fields created, the restrictions on time of hay cutting and types of crops grown, the elimination of grazing because of streams and wet lands and the need to develop new conservation practices will reduce the amount of land which farmers will or can lease. This additional land will then need to be maintained by the Park.

d 4. The removal of the old trees in the Soldiers' National Cemetery should be reconsidered. They are magnificent trees and many people comment on their beauty. Although the restoration of the cemetery to the Saunders' Plan may be desirable, the trees should be only removed when they have deteriorated to the point that removal is necessary. Although this will prohibit an immediate restoration to the Saunders' Plan it will allow the transition to be accomplished without the destruction of beautiful trees. It will also help eliminate the public outcry, which will occur if these healthy trees are removed

e 5. When removing woodlots, has consideration been given to the buffer these woodlots now provide between the Battlefield and modern development? I believe that the Park Visitor would be less distracted from the 1863 appearance by looking at trees then by looking at modern development. It is necessary to closely evaluate this existing buffer before designating which woodlots that are to be removed.

6. Although it is understood that the GMP is only a basic management plan, the plan should address how it will be feasible to reach these goals. If it is not financially feasible to do so, then the goals should be reduced to a degree that will make it possible.

**Environmental Issues**

1. Air Quality - Vehicles that the Park owns, leases or licenses, including tour busses, should be required to be propane gas powered. Some of the Park vehicles presently meet this requirement.

2. Water Quality - Stormwater management basins that intercept the stormwater discharge from the proposed Visitor Center \ Museum complex should be designed to provide a degree of treatment before discharge to stream. This will reduce the amount of pollution from parking lot runoff. Stormwater facilities should also be designed in accordance with the regulations outlined in Cumberland Townships Land Development Ordinance.

2

d Almost all of the trees that are proposed for removal are evergreen trees that block views of the most important portion of the national cemetery—the Civil War interments. Unfortunately, these same trees undermine the original design purposes and messages that the cemetery was intended to convey. Restoring a meaningful association between the landscape and the Gettysburg Address is of primary importance and concern to the park. Although certain trees would necessarily be removed in order to restore that association, other ornamental and specimen trees that also had meaning and design would be reintroduced along the perimeter and drives. Restored planting beds and shrubbery edging would likewise enhance the historic character of this significant contemplative site. Ultimately, the cemetery's appearance should be enhanced by the combination of these actions.

e The majority of woodlands that are proposed for removal are located within the central portions of the park (for example, between Devil's Den and Confederate Avenue). Their removal would reintroduce historic views of the battlefield, primarily on battle action sites, without introducing views of nonhistoric intrusions. However, NPS would also be removing woodlands, hedgerows, and other vegetative growth near or on its boundaries that currently obstruct historic views of the battlefield. Although some of these areas are adjacent to modern development, the increased ability to see the historic terrain and key topographic features would enhance visitor understanding of the battle and the significance of battle features that are currently obstructed by this incompatible growth. In many cases, nonhistoric woods that were planted or allowed to grow in order to hide modern development have obscured key terrain and fields of fire and thereby themselves detract from the 1863 appearance of the battlefield. As a result, some portions of the battlefield have not only physically changed in appearance but have ceased contributing in any significant way to visitor appreciation of these battle sites. NPS would not entertain any new introduction of wooded areas to obscure development if that new vegetation would obscure significant battle topography or historic views (fields of fire).

f Traffic volume and congestion levels were obtained from two recent traffic studies: *Traffic Impact Analysis, Gettysburg National Military Park*, prepared in July, 1994 and *Adams County Congestion Management System Study*, prepared in April 1996. The methodology and the use of these studies is described in the draft GMP/EIS on pages 200 and 220.

## COMMENTS

Transportation

f 1. There was no recent traffic analysis made for this study. Some information was taken from a study made in 1978. How accurate is the statistics from these out dated studies.

2. Prior to the start of any planning on the proposed Visitor Center Complex a detailed traffic study is needed. This study should address the impact of traffic on the Baltimore Pike and Taneytown Road corridor and other major road networks leading to and from the Visitor Center Complex. This study must include traffic generated by anticipated new development.

g 3. With the removal of the existing parking lots and connecting roads the Taneytown Road - Steinwehr Avenue - Washington Street intersection will become even more congested. Can the existing access roads through these parking lots remain?

h 4. With the removal of the existing parking lots, where will vehicles park to allow visitors to visit the Soldiers' National Cemetery and The Angle? If no parking is provided visitors will use the Baltimore Pike area for parking while visiting the Cemetery. The cyclorama parking lot is a well-designed and landscaped parking lot. It conceals vehicles from view for all directions. This parking lot should remain as well as a portion of the visitors center parking lot.

i 5. What is the long-range plan for the Wheatfield Road? For years there has been controversy between the local citizens and the Park over the use of this road.

j 6. The GMP mentions the possible use of shuttles. Prior to using shuttles will there be additional review of a shuttle plan by the general public, or is the mentioning of this use in the GMP sufficient to allow shuttles to be used? Who will own and operate the shuttles? Where will funding come from?

k 7. If shuttles are to be used this will increase the estimated 2-hour time limit that visitors park in the parking lot. How many additional parking spaces will be required if shuttle service is used?

l 8. The GMP states a traffic study of the entire area is needed and the study should be a joint effort between the Park, Pennsylvania DOT, local municipalities and developers. I strongly agree. When will this study be done and who will be the lead agency in having it done? Without this study it is not possible to determine the impact the proposed visitor center complex will have on roadways in and around Gettysburg and the surrounding area; i.e. will a traffic signal be required on the Baltimore Pike, what will be the level of service at other major intersections, what effect will the increase in one way of Park avenues have on local traffic movement, what effect will the change in tour route have, etc.

m 9. Although the GMP does not address traffic accidents, are there areas that must be redesigned or controlled because of a high number of accidents?

10. The GMP indicates that many traffic problems could be corrected by the better placement of signs. Could this not be done now?

3

## RESPONSES

g Access routes between the Taneytown Road and Steinwehr Avenue are addressed in Chapter 2 of the draft GMP/EIS. In Section 2.7.2, Interpretation and Visitor Experiences, Restoration of the Existing Visitor Center and Cyclorama Sites, page 90, the plan states that "Rehabilitation would include...restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery." Although not specifically delineated in the plan, a connecting road allowing passage between the Taneytown Road and Steinwehr Avenue would be present. At this state of planning, it is premature to determine if the connector would utilize any presently existing roadbed.

h Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new museum complex to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

i The Plan does not specifically address any changes in the management of Wheatfield Road. It would remain a two-way road under the preferred alternative.

j A GMP is used to set forth a basic management philosophy for a park and provide a framework for future decision-making. The draft GMP/EIS is only the first step in the planning process that would lead to a final plan for a shuttle system. At that time, specific details as to routes, frequency and other items would be developed. As appropriate, NPS would involve the public as additional planning is completed.

**Social Economics**

n 1. The GMP indicates that the rate of visitors to the new visitor's center will stabilize at 1,462,500 visitors per year. The plan also states that if a new visitor's center is not built the number of visitors to the visitor's center will decline to 1,096,818 visitors per year. Did the study take into account the continuous increase in population growth within a 2-hour drive of the GNMP? This growth will create a sizeable increase in the number of people who may use the Park.

2. There is reasonable to expect that a convention center will be built in the Gettysburg area in the future. What effect would this have on Park visitation and the economy?

3. I am also a firm believer that visitors come to see the Battlefield not the Visitors Center. I do not agree, that unless a new visitor's center is built, the people will stop coming

o 4. The proposed cafeteria in the Visitors Center Complex may not directly have a great effect on the local economy if kept at the level proposed and the hours of operation are not extended. Indirectly it may. By eliminating the need for visitors to go to local restaurants to dine, the number of visitors who also patronize other business while there will also decline. What assurance do we have that these commercial activities will not be expanded or the hours of operation increased?

5. The GMP emphasizes partnership but fails to address the informal partnership now existing between the Park and the Steinwehr Avenue businesses. Without the Park these businesses would not exist but without these businesses the visitor to the Park would not have the services they need and expect. The parking lots are another example of this partnership. The Park's parking lot does provide parking for visitors who visit the businesses but the business parking lots also provide parking for people who visit the Park

6. The plan indicates that approximately $302,000 in admission taxes will be paid to local agencies. With the recent change in the Pennsylvania admission tax law, will this tax still be paid in 5 or more years?

p 7. The Park is being used more and more as a recreational park and not as a memorial park. Bicycle and horseback riding, jogging, hiking, etc being the primary recreational uses. With the increase in population and the interest in recreational activities the park will continue to see an increase in visitation for recreational use. What is the intent of the Park regarding recreational use?

**Preservation**

q 1. With the continuous increase in development there is an immediate need now to preserve the private owned lands within the GNMP, the Gettysburg Battlefield Historic District and the viewshed beyond. The GMP states "Adams County is growing at a rate 15 times or more faster then the Commonwealth of Pennsylvania. Even if the Historic District is expanded the Park now has little control over development within this district. What can and will the Park do to protect these areas?

r 2. With the construction of the proposed Visitor Center Complex the Baltimore Pike Corridor will be placed under tremendous development pressure. What can and will be done to protect this corridor?

4

k The calculations included in the draft GMP/EIS took into account the modest shuttle proposed by the action alternatives. The length of stay figure you reference is the average length of stay of visitors in the proposed museum complex. It estimated visitor stays based on projected patterns of visitor activity. For example, some people only come to the complex to use bathrooms or pick up a brochure; others may stay for a longer period, visiting the museum or another venue; and some may park in the parking lot and use the shuttle. The percentage of visitors that might fall into these and other categories were estimated and the total averaged to develop the length of stay information. Therefore, the parking lot includes spaces for those that would park and use the shuttle system.

l NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

m You are correct that GMPs do not generally address such issues. However, on page 203 of the draft, the GMP/EIS does indicate areas where the historic road system provides poor sight distances and/or inadequate geometry for modern vehicles. These areas would be addressed in the park-wide traffic information system study, an implementation study that would be completed after a final alternative is selected by NPS. Such a study could also address signage needs.

n The economic assessment took into account the population increases projected within the market area of the park. Page 230 of the draft GMP/EIS notes some of these underlying population trends that may affect the level of visitor use and/or visitor use patterns in the park.

## COMMENTS

s

3. How will the remaining lands owned by Levan, especially those lands north of Hunt Avenue, be protected? The 1990 Land Protection plan states some limited development would be considered. What is considered limited development? Will the Land Protection plan need to be revised to allow the construction of the Visitor Center Complex?

Interpretation

1. People worldwide recognize the name Gettysburg as being the place where Abraham Lincoln gave one of the greatest speeches known to man. The Gettysburg Address. Why is not one of the GMP goals to secure a copy of The Gettysburg Address for permanent exhibit at Gettysburg?

t

2. The present visitor's center could be reduced in size and remain as a place to honor and interpenetrate Abraham Lincoln and The Gettysburg Address. It is only a few steps from where he stood on November 19, 1863.

Visitor Center \ Museum Complex

1. At the time of review of the Draft Development Concept Plan for the Visitor and Museum Facility, I had provided written comments and suggestions regarding an alternate for a proposed Visitors Center \ Museum. That alternative had not been selected and it appears that any further argument regarding how and where the proposed Visitors Center \ Museum is to be built would be comparable to beating a dead horse.

2. The NPS should remember that when the present Cyclorama - Visitors Center was built in the 1960's there was a great cry from the public that it should never be built there and the design of the building was not compatible with the historical setting. It is hoped that history will not repeat its self.

u

3. The GMP states that the Visitor Center complex will not be built unless all funding has been secured. The majority of the GMP is developed around the concept that the Visitor Center Complex will be built. If funding is not secured, will the GMP be void and another plan developed?

v

4. Kinsley's letter of intent, dated July 10, 1998, states that if revisions are made to the Kinsley proposal, the proposal is then subjected to the public planning process. This should be clarified. Does this mean the project can be designed and built without future public review if no revisions are made? What revisions are being referred to?

5. I was greatly disappointed that no additional information was submitted with the GMP on the Visitors Center Complex. There is no proposed site or land development plan, building plan, architectural rendering, agreements or other information to review. The conception plans previous submitted were too preliminary to evaluate. With out this information it is impossible to comment further on the Visitor Center Complex.

## RESPONSES

o

NPS evaluated the impact of the cafeteria-style restaurant in the proposed park museum complex on the local tourist economy. The analysis found that even with the inclusion of food service in the park museum complex, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility would offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

p

The comments you made regarding recreational uses of Gettysburg National Military Park are addressed throughout the draft GMP/EIS. In Chapter 1, Section 1.5, Mission Goal 3: Visitor Use and Facilities, page 8, the plan provides for general use by the public with the understanding that "recreational opportunities must be consistent with the park's purpose and significance and not harmful to resources or park visitors."

The plan also states that the park "will provide paths and trails only when they meet certain criteria. Paths and trails must provide educational opportunities or access to historic sites that fit the park's mission and purpose. Gettysburg NMP will not provide facilities developed and intended for purely recreational use or exercise functions. For example, the park would not provide jogging trails with exercise stations, mountain bike trails and other similar facilities that do not have an interpretive or visitor use function directly

**Conclusion**

1. The GMP should more fully address how and when many of the proposed actions are to be accomplished. Although there have been many verbal comments made by Park staff during the workshops and meetings, unless these specifics are included in the plan, the person reading the plan will not have a clear understanding of how these actions are intended to be instrumented. A clear and detailed outline for financing and implementing these actions is necessary. This information is also necessary to assure that future Park staff, who may not been involved in the preparation of the GMP, have the necessary information and guidance to administrate the plan.

w 2. Many times the GMP refers to the need for more detailed studies to be conducted before any action is taken. This is understandable but will the general public be given a chance to review and comment on these additional studies?

3. The amount of funding necessary to implement this plan will require the plan to be implemented in phases. The plan should establish phases and priorities for implementation.

4. One of the goals should be to secure a copy of The Gettysburg Address for permanent exhibit at Gettysburg. Consideration should also be given to using a portion of the existing Visitor Center building as a place for exhibition and interpretation of The Gettysburg Address and Abraham Lincoln.

5. Prior to any further development of the Visitors Center Complex a detailed traffic study must be made.

6. To protect and preserve the Battlefield the NPS must develop a way to preserve the significant historical areas adjacent to and visible from the Park, especially the Baltimore Pike and Taneytown Road corridor. Many of the proposed goals can be instrumented in the future, but the future is now if you wish to preserve the land

7. When plans, architectural renderings and agreements of the proposed Visitor Center Complex become available, additional public review and comments should be allowed.

Very truly yours,

Dean A. Shultz





related to the park's mission and purpose." (Chapter 2, Section 2.7.3, Paragraph 3, page 93)

Likewise, the plan also provides that "All public activities are systematically evaluated for appropriateness before they are permitted. Appropriate Action may include: Using NPS criteria to determine if and when uses are compatible, cooperating with local groups to find alternative locations for events, and prohibiting uses that damage park resources and do not contribute to understanding of park values and resources." (Chapter 2, Section 2.7, Table 5. Category: Visitor Use and Facilities, page 76)

q Lands within the park's authorized boundary would be protected in accordance with the 1993 Land Protection Plan. In order to protect lands and viewsheds outside the park boundary, the park proposes to implement the management prescription outlined in Table 5, "Summary of Management Prescriptions Common to all Action Alternatives," (p. 77) of the draft GMP/EIS. This management prescription, which states that the "park's scenic and rural setting remains relatively undisturbed, and development within the park's viewshed is compatible in scale and intensity," is described in further detail on p. 100 of the draft plan.

r Like the commentors, NPS believes it is in the best interests of the park's resources to limit additional roadside development on the Baltimore and Taneytown Pike gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 *Land Protection Plan* (LPP). The language in the draft GMP/EIS regarding the protection of Baltimore Pike has been strengthened. NPS would work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to protect these corridors.

The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed new visitor center. This use would be removed and the land would remain open if any of the GMP action alternatives are implemented. NPS would continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the museum complex remains residentially zoned. This issue is discussed on pages 100-105 of the draft GMP/EIS.

| COMMENTS | RESPONSES |
|---|---|
| | **s** Since this portion of the LeVan tract is within the park's boundary, NPS can protect the lands by acquisition of either fee or easement interest in the property. In addition, existing township zoning codes establish development controls for the area.<br><br>The GMP is the park's primary planning document. After NPS selects a GMP alternative, it would update the Land Protection Plan in accordance with the management prescriptions contained in the final GMP/EIS. |
| | **t** The alternative of retaining all or a portion of the current visitor center building was considered in the 1996 Development Concept Plan/Environmental Assessment for Collections Storage, Museum and Visitor Center Facilities. However, it was not the preferred alternative (for either NPS or the public), since retaining the visitor center in its current location violates one of the primary legislative purposes of the park: to preserve the significant topographical, natural and cultural features that were significant to the outcome of the Battle of Gettysburg (draft GMP, p. 5). In addition, there would be significant costs required to correct the numerous and serious infrastructure, life-safety, and handicap accessibility deficiencies of the current building. |
| | **u** The draft GMP/EIS describes the type, use, and benefits of a proposed new museum complex, and suggests that the proposed partnership between NPS and the Gettysburg National Battlefield Museum Foundation is the most feasible method of accomplishing those goals. However, if the Foundation is unable to secure sufficient funds to construct the complex, it would not change the overall goals identified in the GMP. In that case, NPS would pursue all other feasible funding alternatives to achieve its goals. |
| | **v** The revisions referred to in the Letter of Intent are those which may arise from the public review and comment upon the draft GMP/EIS.<br><br>The purpose of a GMP is to define the basic philosophy of park management and provide broad guidance to park managers, by setting direction for resource preservation and visitor use in consultation with the public (p. 2, draft GMP/EIS). Throughout the development of this draft GMP/EIS, considerable public discussion took place concerning the purpose and benefits of the |

proposed museum complex, and the appropriate visitor services and public uses of the building (as well as the anticipated spaces allocated for such services and uses). However, GMPs are not intended to provide precise design details of proposed developments.

Actual design of the proposed museum complex would not begin until after NPS has selected an alternative, the GMP process is complete and the NPS signs a formal agreement with the Gettysburg National Battlefield Museum Foundation. At that time, in accordance with the Letter of Intent, the Foundation would be responsible for providing a design concept for "facilities that respect their location and the historic vernacular building tradition of the area; respond sympathetically to the natural landscape features of the site; and become a positive catalyst for preservation and a lever for sensitive development of surrounding areas." (draft GMP/EIS, p. 327)

w The public will be given the opportunity to comment on implementation plans when that is called for by the National Environmental Policy Act. Not all implementation plans require additional public involvement, however. For example, NPS does not generally provide for public comment on maintenance plans (e.g., to replace a roof in kind on a historic structure, repair a monument or similar types of work) and other similar types of implementation plans.

## COMMENTS

Author: Nettie Sievers at NP--INTERNET
Date: 10/8/98 2:53 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: comment on the plan
---------- Message Contents

To whom it may concern,
My opinion on this proposed plan is that, I agree with allot of it. I would love to see the park restored to its natural ground on which soldiers fought on in 1863.
The plan for the visitors center is also good, as well as trying tc preserve the painting that is in the cyclorama.
It is an awesome depiction of what the men went thru on that terrible day.
I also feel that opening more jobs is a wonderful idea, especially for those who are looking for jobs in their field of study.
All in all this is a wonderful plan and I stand by it 100 percent.
Sincerely,
Jeannette E. Sievers

==
Vivandiere
for 1st New York
Reynolds Battery L
Light Artillery
Re-enacting Organization

## RESPONSES

### Jeanette E. Sievers

**Dear Dr. Latschar,**

AS A MEMBER OF THE FRIENDS OF THE NATIONAL MILITARY PARK AT GETTYSBURG I WOULD LIKE YOU TO SUPPORT THE GENERAL MANAGEMENT PLAN & NEW MUSEUM PROPOSAL. I FEEL IT IS UP TO US TO PROTECT THIS MEMORIAL FOR FUTURE GENERATIONS TO ENJOY & THESE TWO PROJECTS WILL HELP ENSURE THAT. THANK-YOU

Sincerely, Jim Simpson

Name TIMOTHY SIMPSON

Address

Timothy Simpson

## COMMENTS

**Dear Dr. Latschar,**

AS A CONCERNED CIVIL WAR HOBBYIST, I FEEL IT IS IMPORTANT TO MOVE THE GENERAL MANAGEMENT PLAN FORWARD ASAP! TO PRESERVE GETTYSBURG'S PLACE IN OUR COUNTRY'S HISTORY, WE NEED TO IMPROVE PRESENT FACILITIES FOR THE GENERATIONS EVER FURTHER REMOVED FROM THE BATTLE. THANK YOU FOR THE OPPORTUNITY TO BE HEARD!!

Sincerely,

Name CYNTHIA R. SLAGEL

Address

## RESPONSES

**Cynthia R. Slagel**

## Rex L. Sluyter

October 7, 1998

Dr. John A. Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar;

You and your staff have done an outstanding job creating the draft of the General Management Plan and Environmental Impact Statement. I must admit it took some time to read and study, however, it was well worth it. I congratulate you for the terrific job that you have undertaken.

These proposed modifications to the Park, when completed, will provide the citizens of these United States an everlasting true to life image and a better understanding of the most important phase of our history.

Thank you for an excellant job well done.

Sincerely,

Rex L. Sluyter
1st Corp - FNFG

## COMMENTS

Author: Tom & Beth Smith at NP--INTERNET
Date: 9/29/98 4:09 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: Gettysburg General Management Plan
---------- Message Contents ----------

Dear Superintendent Latschar:

I received in August a copy of the Draft Management Plan and Environmental Impact Statement for Gettysburg. I read it cover to cover with much interest. I agree with the parks mission and its goals. My children and I have visited the park and while we enjoyed it, I would like to see improvements.

I find Alternative A completely unacceptable. Similarly, Alternative B is a step in the right direction but not far enough. I find Alternative C is the MINIMUM restoration I would like to see. The restoration of the Major Battle Action Area is, I think, essential to making Gettysburg the park it should and was intended to be. For a visitor to be able to fully appreciate the battlefield, these changes are a must.

I would like to see Alternative D come to fruition if at all possible. Gettysburg National Park is indeed a national treasure and its place in our nation's history makes it deserving of this degree of restoration and rehabilitation. To restore it as best we can to its 1863 status would benefit all future generations. I particularly like the following:

rehabilitation of 160 acres of orchards; restoration of grade & height of Civil War era gravestones; restoration of Civil War era buildings; reconstruction of 16 miles of historic lanes; remove non-historic woods; restore fences, woodlots, orchards, and vegetation to its 1863 status. I found no environmental reasons to not implement Alterantive D. I also would like the idea of moving the Visitor Center.

I will write to my congressional representatives and voice my support for this plan. Thank you for keeping me informed.

Sincerely,

Beth R. Smith

## RESPONSES

**Beth R. Smith**

**Seward J. Smith**

November 9, 1998

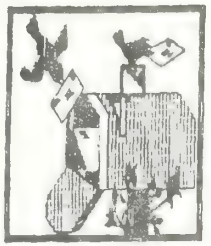
Dear Mrs Lateiler,

Switched with pleasure the Remembrance Day activities yesterday, and thought how fortunate my family and I are to be here in Gettysburg. We moved here in 1982, and never regretted the change.

Our home and the Gettysburg battlefield area are very special to us. The National Park is special to all Americans and many visitors from other countries. Our family has read and listened to the debate about proposed changes.

Our family is basically asking you to consider a few outcomes ① Keep all or as much as possible of the Gettysburg historical experience under the Park Service, and keep the privatization or commercialization entirely out of the equation. Now we already have a large Tower — some will lead to more and change forever what makes Gettysburg special. I know it is tough, but Congress should preserve the experience for all Americans. It is their responsibility and well as what we can do locally.

| COMMENTS | RESPONSES |
| --- | --- |
| ② | |
| ② Please keep the roads open to all regular traffic as it is now. You have already taken care of those people who drive not to drive around the battlefield. I know the roads are more used during the six warmer months (especially the 3 summer months) — but using the roads for all citizens is always "doable" and a freedom we enjoy as Americans. Please do not take away this right and privilege. It keeps us all responsible. | |
| ③ Please do not cut down large amounts of trees to give the area a 1863 look. The wooded areas provide a sanctuary for animals and people from the surrounding world, and a recreation/relaxation place for us. We can appreciate through photographs the barren, scarred nature of the war in Gettysburg without destroying the beautiful views and forested, cool areas on the battlefield. They also help us fight pollution and restore the soul. | |
| I appreciate your consideration in this matter, and look forward to many more years of living, working and helping in Gettysburg. If I can be of any assistance, please contact me at (717) 334-5601. | |
| Sincerely, Dennis J. Smith | |
| P.S. Boy Scouts would welcome a site to work on Civil War battlefield areas (BY YOU) | |



*Ken Snyder II*

October 12, 1998

Dear Superintendent Latschar;

My name is Ken Snyder II and I am a resident of the Borough of Gettysburg. I reside in Gettysburg but work in Mechanicsburg. The reason that I point this out is to explain that I do not work for a company effected by anyone visiting or not visiting the Gettysburg Battlefield or attractions. I feel that I can provide an unbiased and honest opinion of the future of Gettysburg National Military Park. I have carefully reviewed the General Management Plan and have put great thought into my opinion and statement. I hope that you consider this when you make the final decision on the General Management Plan.

a I would like to begin by saying that I believe that there should be a full inquiry regarding renovating the current facilities. Every measure should be taken into consideration to improve the existing buildings. I would like to think that the simplest solutions such as humidifiers and dehumidifiers were already attempted. Each item in the park's collection should immediately be inventoried. What would happen if a fire, flood, theft, or any other disaster happened and a detailed list was needed?

b If it is determined that the current facilities cannot be modified, land should be sought after that has already been developed. The construction of the new facilities should not destroy or alter historic land that has remained untouched since 1863. It seems to me that there is an ideal tract of land that has been extensively developed, is not currently being used and there are no plans to utilize it, and is currently owned by the National Park Service ... Guinn Woods or Fantasyland. If this land is used, it would also solve the problem of parking for the National Cemetery without much cost.

c I would exhaust every possible method of collecting donations from the public and government grants and fall back on a private -- public venture as a last resort. The generosity of the American people may surprise you. If one were persistent enough, I'm sure that a partial if not entire grant may be given to build the new facility from the government.

If one had to choose between the two, the current Visitor's Center is far more historic than the Cyclorama Center. If a new Visitor's Center is constructed, there is no question that the current buildings need to be razed.

## Ken Snyder II

a The environmental storage controls within the collections storage area of the current Visitor Center are practically non-existent. There is neither heat nor air conditioning in the vast majority of the 6,000 square feet of storage space, which makes the temperature control for artifact preservation impossible. The entire 6,000 square feet area lacks humidity control, which makes it impossible to protect the artifacts from wide fluctuations in relative humidity. Finally, there is no air circulation system in the storage area. None of these problems can be solved in isolation. For example, the lack of temperature control is a major factor leading towards wide fluctuations in humidity. Likewise, it is impossible to provide heating and air conditioning (temperature control) without installing an air circulation system for the entire storage area. In 1988, the NPS estimated that the cost of correcting these basic environmental storage problems would be over $1.6 million (not including funds required to address any of the other storage deficiencies, such as lack of adequate storage space.) The use of portable dehumidifiers would have a negligible effect upon these area-wide environmental deficiencies.

The NPS has a manual (hand-written) catalog of the collection, and is in the process of converting to the NPS-standard Automated National Catalog System. As part of this automation process, each item in the collection is physically inspected and artifact data is updated as necessary. A second set of both manual and automated catalog records is maintained at the NPS National Catalog repository at the Harpers Ferry Center in West Virginia.

b The site that was selected for the proposed museum facility meets the NPS criteria for site selection which were made available for public comment in the April 1996 *Draft Development Concept Plan/Environmental Assessment, Collections Storage, Visitor & Museum Facilities*, and subsequently required in the 1996 *Request for Proposals*. As may be seen from Figure 9, "Battle Action Area" map in the draft GMP/EIS, the site is outside the major battle action areas of the park. It is located adjacent to the former Fantasyland site, where development of future NPS administrative and maintenance facilities is proposed.

## COMMENTS

Page 2 (Snyder, General Management Plan Comment)

The battlefield needs to be restored to the 1863 appearance. If this involves removing trees, then so be it. If this involves adding trees, then so be it as well. The park was designed to commemorate the soldiers, not to create a nature sanctuary. One should be able to step back in time when they enter Gettysburg National Military Park. The landscape should be returned to the Battle--era appearance. The asinine statement that if the trees are removed, the monuments should be removed should not even be considered or taken seriously. The monuments were put there to honor those who fought here and enhance the visitor's experience by their quiet dignity.

The interpretive markers placed by the Park Service are very informative and should remain. That program should be expanded to help the visitor understand the battle action by adding more markers. It is also helpful if each marker displays a photograph pointing out the historic areas like most do.

Another excellent program which seems to have been discontinued is the audio stations. The informative boxes at Little Round Top, Devil's Den, and the Virginia Memorial were removed some time ago; however, those at the Mississippi Memorial, Meade's Headquarters, Point of Woods, and the two at the Eternal Light Peace Memorial remained. For at least eight months, only one at the Eternal Light Peace Memorial and the Point of Woods were operable. Currently, none are available to use. I would like to see this program expanded to include other battlefield locations.

The parking concept being used on Hancock, Stone, United States, and West Confederate Avenues is excellent and should be used throughout the entire battlefield to help alleviate traffic problems. To simplify the idea, all park avenues should be made one way with traffic flowing on the left side of the road and parking on the right. By implementing this on all park avenues, there would no longer be an issue of roads not being wide enough to accommodate two way traffic. It would also make the practice of pulling off the road to park virtually nonexistent. One should be able to stop to inspect every monument without parking illegally or causing damage to the historic battlefield.

One can read, or maybe hear about the Union fishhook shaped defense line. One can even drive over and visit the land where Union soldiers fought or look at it on a map. There is nothing quite like climbing the National Tower and seeing the land in person as a bird may have seen it in 1863. I support the National Tower and think that they offer a lot to the Gettysburg experience. If the National Tower is an eye sore and removed, then so should the macadam monument to greed on East Cemetery Hill known as Gettysburg Tours, Inc. If you talk about destroying sacred land, isn't the tour center parking lot sitting right on the battle line? If the tower is removed, than so should the tour center. Finally, are they reimbursing the National Park Service for wear and tear on the avenues?

Thank you for your time and consideration. I hope that you will reflect on this as you prepare your final draft of the General Management Plan. I welcome and encourage you to contact me if you have any questions or would like further comment.

Respectfully Submitted,

Ken Snyder II

## RESPONSES

c The draft GMP/EIS (pp. 97-98) proposes that "no less than" $27.36 million be raised through grants and non-profit fundraising, while "no more than" $11.925 million be raised through commercial loans. If the Foundation is able to raise donated funds in excess of $27.36 million, then less money will be borrowed; if the Foundation is able to raise the entire required amount, then no money will be borrowed. In each of these cases, however, a public-private partnership is required for the fundraising effort, since the NPS is not allowed to solicit funds directly.

*Robert W. Soulen, Architect*

August 21, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar:

As a member of the Friends of the National Parks at Gettysburg and one who played on that field as a youngster I want to indicate, in general, my approval of the National Park Service Alternative C proposal to a new visitors center. It is imperative that the existing inadequate center be removed and the area returned to its appearance when Federal lines occupied the site.

I have two comments to make concerning the proposal. First, the elimination of the I-MAX theater in favor of a traditional theater is a serious mistake. I have recently been involved with the new I-MAX facility at the National Museum of Naval Aviation at Pensacola, Florida and the public reaction has been phenomenal. Second, I hate to see the cafeteria planned to meet "minimal needs" and the public will soon make their frustration known with minimal food service at the center. In my experience, families on vacation want, at least, fast, adequate food service and will be vocal in complaints otherwise. My last visit to the center was in October of 1997 and it was very crowded.

Thank you for your consideration.

Sincerely,

Robert W. Soulen

RWS/k

## Robert W. Soulen

## COMMENTS

Dear Dr. Latschar,

As a member of the Wash. DC Civil War Round table and a Friend of the National Parks of Fredericksburg, I wish to thank you for outstanding efforts as Park Superintendent. I am very grateful for all your efforts to include us in your process. The GMP seems to work fine.

Sincerely,

Name Thomas Spavias

Address

## RESPONSES

**Thomas Spavias**

MATTHEW W STEED

22.9.98

Dear Sir

Thank you very much for sending me a copy of the General Management plan and Environmental impact statement of the Gettysburg National Military Park.

Despite being a Native Australian I have been a keen civil war buff ever since I saw the movie Gettysburg four years ago and have a special interest in Gettysburg in particular having visited your wonderful park two years ago.

Because Gettysburg will always hold a special place in my heart I think it would be great for the visitors to have the major battle action areas restored to their 1863 appearance

I also support the plan for a new visitor centre and enlargement of the book store.

1.

**Matthew W. Steed**

| COMMENTS | RESPONSES |
| --- | --- |
| Since returning to Australia I have ordered a number of books from your store and have been impressed with the range you carry. Although I think your catalog could have more books listed<br><br>In short I support the proposed Plan, Plan C. Hoping to visit again in the near future<br><br>Kindest regards<br><br>Matthew Steed<br><br>P.S. I am 39 years old. | |

Dear Dr. Latschar,

We are behind you 100% in your efforts to move ahead with the General Management Plan for the Nat. Park

Sincerely,

Name Harry B. Steinbach

Address

Harry B. Steinbach

## COMMENTS

**Dear Dr. Latschar,**

It's important that the General Management Plan move forward! We appreciate the opportunity to be heard.

Sincerely,

Name Katie Stella

Address

## RESPONSES

**Katie Stella**

October 8,1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Sir:

As a licensed battlefield guide, member of the Friends of the National Parks at Gettysburg and member of several Civil War battlefield preservation organizations, I write in support of Alternative C, the Proposed Plan, outlined in your Draft General Management Plan dated August 14,1998.

Something must be done, and done soon, to preserve the battlefield, the National Cemetery, monuments and artifact collection for future generations. I applaud you and your staff for the courage to pursue these objectives in the face of local and national interests groups.

Current building facilities and parking have been inadequate for years. As a guide I have heard many visitor comments critical of overcrowded buildings, antiquated museum displays, lack of refreshment availability and greatly overtaxed parking areas. These inadequacies detract from what otherwise is a highly memorable experience for just about all visitors to Gettysburg

Far from fearing the utilization of private funding for the proposed plan, I believe it is a positive step. Private industry is motivated to satisfy public needs and may be able to contribute a great deal to improving visitor enjoyment with the Gettysburg experience.

While I prefer the "Fantasyland" site, I do support the currently proposed site for the new facility. Businesses nearby the current buildings may have to work a little harder to attract business in the future, and that may be very positive for future visitors.

a Finally, I make one very minor request which is not specifically addressed in the draft plan. Licensed battlefield guide are sometime asked about access to Neill Avenue and the monuments located there. This is virtually impossible without permission to cross private property today. I believe their should be a public right-of-way for any visitor to access these monuments as they may any others.

Thank you for your continued efforts and best wishes in achieving your worthy goals.

Sincerely,

Thomas J. Stenhouse

637

## Thomas J. Stenhouse

a The park's Land Protection Plan identifies land between McAllisters Mill Road and the western end of Neill Avenue as tract 08-114. It is designated as a high priority acquisition to be acquired in fee. Acquisition of this land would provide public access to the monuments on Neill Avenue.

| COMMENTS | RESPONSES |
| --- | --- |
| 10/6/98<br>Superintendent<br>Dr. John Hutchar<br><br>I did not know, although I might have guessed, that I would be walking into a hotbed of conflict and controversy when I came to the public meeting Thurs Oct 1 in the cyclorama auditorium. And as a result my remarks were more spontaneous and unrehearsed and I never actually spoke much of what I had pre determined to say. So I will put them to paper.<br><br>First I believe the proposed plan C is a very fine idea with but a few concerns on my part. The restoration of fence lines, orchards, building foundations, trees and shrubs is excellent noting. along with identifying the locations of missing structures would be extremely helpfull in visualizing more fully the events which took places. I would urge immediate implementation of that part of the plan that all possible.<br><br>As an example of the need for this as interpretation I site the marker a few hundred yards South of the angle relating to the vermont regiments flanking of Kempers division. The plague | **Bill Stephens** |

States that the vermonters extended their line westward and anchored the extreme left in the Cordori thicket which at present time does not seem to exist. So the full perspective of their manueuver was unable to penetrate my mind.

There are numerous locations throughout the Park where restoration of this seat would be of great benefit.

Another concern: that the artifacts currently on view at visitor center do not vanish from site in the new facility. I have seen several occasions where museums would expand in floor space supposedly to allow for more exhibits space only to find the now familiar exhibits are no longer available to view. My suggestion is allways add to the exhibits never detract. Personally I would be very P. Oed if next time I came to Gettysburg I could not find the two Bullets which collided in mid air now on display.

Also modern facilities allways seem to pride them selves with security measures. i.e. Electronic Alarms, Cameras, various technicall mechanisms and worst of all armed and uniformed

| COMMENTS | RESPONSES |
| --- | --- |
| Security guards patrolling and leaning over peoples shoulders. Too much of this is a bad thing since it gives off the impression to visitors tourists that they are now considered intruders instead of welcomed guests. Please do not allow this to happen. | |
| The plan suggest partnership between the Park and borough of Gettysburg. very good. Especially a connection between the Visitor House and RR Depot. And also a greater telling of Gettysburg's part in the overall picture of the War. I would suggest also a connection with the G.A.R. post in Gettysburg. In your museum area you tell the story that during the canonade a union soldier stoped over to pick up his canteene and while so doing a shell wedged into the tree directly behind him. That after the war he came back and cut the tree down. What you don't tell is the rest of the story. I found the rest of the story to be in the basement of the G.A.R. Building. For that is where the trunk of the tree is with a shell from a 3 inch ordinance rifle wedged in it. | |

In regards to the restrictions of placing new monuments in the park. It is the monuments which give the park [redacted] perspective and proportion. A few more judiciously placed monuments may be usefull. Also I know that indiscriminatley placed and frivoulous monuments would serve no purpose. Please approach this issue with caution.

I can see and understand the very real concern for preserving the current threatened monuments and the mounds on which they rest. But I will say this The need to touch is a very big aspect of the Gettysburg experience. To touch what THEY touched, to stand where THEY stood is at the core of the reason why we as a nation make our pilgrimages to Gettysburg. We must be allowed access to there - not to vandalize but to Venerate.

You have a wrought iron fence around the copse of trees. To protect the copse obviously. You now have a temporary fence around the iron fence. and I see the ground is compacted and the vegetation gone. However we as a

## COMMENTS

nation and as individuals need access to that site in order the original Peace to satisfy our inner drives which have compelled us to be there.

I am thoroughly convinced of your appreciation, dedication, concern and sincerity of purpose towards Gettysburg National Military Park and that you will be able to do what is good and correct for its preservation into the future.

It would be complicated for me to explain to you my sentiments and attraction to Gettysburg. But I will tell you this much. I see Gettysburg as the Crown Jewell of American History and it is a healing to my soul to be there.

When the good citizens of Gettysburg and Adams county get fractious and rowdy AND forget their Purpose remind them that they are the custodians of a very great treasure and the rest of the nation expects them to be faithfull to there trust.

If I can be of service call on me at any time

Sincerely,

Bill Stephens

## RESPONSES

**Dear Dr. Latschar,**

THE GNMP GENERAL MANAGEMENT PLAN IS VERY IMPORTANT TO THE PROTECTION OF OUR GETTYSBURG HISTORY AND SHOULD BE MOVED FORWARD WITH ALL POSSIBLE SPEED. AS A MEMBER OF FNPG WE APPRECIATE THE OPPORTUNITY TO BE HEARD.

Sincerely,

Name JAMES H. STEPHENS

Address

**James H. Stephens**

## COMMENTS

KENNETH R. STILES
ATTORNEY AT LAW

October 12, 1998

Dr. John A. Latschar
Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

RE: Draft GMP for Gettysburg National Military Park

Dear Dr. Latschar,

Thank you for the presentation of the GMP in Pittsburgh on September 24. The copy to the Draft GMP that I requested arrived within three days. This excellent service was matched by the quality and depth of the material in the GNP. You and you staff are to be commended for an excellent job.

In the last thirty years I have visited most of the National Military Parks that are east of the Mississippi and have always left with deep respect for the National Park Service's work in preserving and interpreting our history. However, a somewhat shabby appearance lessens the experience and this shabbiness has become more and more evident as Congress has played its political games with the NPS budgets. The plight of Gettysburg has been very noticeable and widely reported in the press.

The GMP would address all the problems concerning the Visitors Center and Cyclorama Building. The additional work on the park grounds as set out in Alternatives C or D are inspirational and would make Gettysburg the crown jewel of National Military Parks. Having the landscape restored to its 1863 appearance will make the visualization the historic events more vivid and the experience of visiting the site more meaningful. While I would like to see Alternative D I understand that the NPS portion of the capital cost of Alternative C is more likely to be funded. I therefore support Alternative C.

On the question of private development providing the new Visitors Center I am sorry that the shameful neglect of Congress has made such a proposal necessary. It is clear that Congress will not act to preserve and enhance one of our national treasures so it must be done by other means. The private/public partnership you have sculpted is excellent and I fully endorse it.

Very truly yours,

Kenneth R. Stiles

## RESPONSES

### Kenneth R. Stiles

## John Page Nicholson Stull

**JOHN PAGE NICHOLSON STULL**

October 15, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

RE: Comment on Draft General Management Plan and Environmental Impact Statement

Dear Sir:

The National Park Service is to be commended on the thoroughness of the *General Management Plan and Environmental Impact Statement Draft* and for its thoughtfulness in conducting workshops and hearings to acquaint the public with the plan and obtain comment.

Above my desk hang two pictures of my great grandfather, Lieut. Col. John Page Nicholson, who served as Chairman of the Gettysburg National Military Park Commission for nearly a quarter century and whose efforts profoundly influenced the battlefield's growth into the memorial the National Park Service manages today. One picture is an ambrotype of First Lieutenant Nicholson beside his horse, Mac, a year before Gettysburg. The other is a photograph taken 52 years later as Colonel Nicholson was seated before the 28th Pennsylvania Infantry memorial with two children, my father John Nicholson Stull and my aunt Eleanor Crane Stull. More than any other vestiges, these pictures are an enduring reminder that our ties to the events at Gettysburg are recent and profound.

As I reviewed the draft plan I wondered what Colonel Nicholson would think of Gettysburg's development in the years following his death and how he would respond to the General Management Plan were he alive today. Certainly I would not presume to speak for him, but surely he would understand how the Military Park has evolved over time, as well it should. What once was a place of reunion for comrades at arms whose lives were forever changed by the battle became under Colonel Nicholson's guidance a solemn and fitting memorial to their bravery and sacrifice.

Today, the Park serves many purposes. Not only does it commemorate the engagements and the courageous men who fought them, it has become a focal point where people of every age can experience first hand a significant chapter in America's history and reflect upon its importance to their nation and perhaps to their own lives.

All of us – those who visit Gettysburg, those who live here, those who manage the Park, those responsible for sustaining it, and those who will rest here forever – are stewards of this hallowed ground. If our elected representatives object to reliance upon private interests to preserve and develop the Park – and caution is certainly warranted – then it is incumbent upon them to provide the public resources needed to implement a suitable and comprehensive management plan such as Alternative C.

History demands our commitment to insure that the Gettysburg National Military Park properly honors antiquity and conveys its timeless story and invaluable lessons to the American people now and forever.

Sincerely,

Page Stull

## COMMENTS

Preston J. Sturdevant, Jr.

October 9, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

Thank you for the copy of the DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT ( GMP ) for the Gettysburg National Military Park which was recently sent for my review.

I have conscientiously studied this document for many hours over the past few weeks and have contemplated with great difficulty just how I should respond. I would like to be one who feels confident in this planning and in agreement with all of its provisions, but I find that I am troubled, instead.

I agree with the concept of restoring the landscape ( including groves of trees, etc ) as nearly as possible to their 1863 appearance, but I disagree with the thought of removing some of the existing well-located facilities that did not exist at the time of the battle but which have since been established to help the visitor appreciate this history better. I would agree about removing THE Tower, an eyesore but also a good reference point visible from all over the battlefield, while I oppose the planned new Visitor Center and to the removal of the existing amphitheater from Pitzer Woods. Have you ever sat there in the amphitheater at sunset on a warm summer's evening, enthralled with the natural beauty of the scenery, and enjoyed the popular evening campfire program ? I have, many times and the beauty and the history of this area makes this a very compelling portion of the battlefield. How could any alternate location behind the proposed new Visitor's Center ever compare ? It couldn't !

I have great difficulty understanding the motives behind the thoughts of attempting this relocation.... unless there is the ulterior motive of beginning the process of removing all automobiles ( except hired vehicles, of course ) from the park.

a Likewise I am concerned about the apparent plan to curtail the traffic flow throughout the park based upon the reasoning that vehicles pulled over to examine a monument make problems. Why not eliminate the problem by creating more and larger pull off spaces ? The Draft Plan seems to want to make this more difficult for visitors rather than less difficult. The refusal to widen these roadways which were

## RESPONSES

### Preston J. Sturdevant, Jr.

a Because the avenue system contributes to the national register significance and eligibility of the park, neither NPS nor the State Historic Preservation Officer is in support of changing this historic landscape feature. Widening of the park's avenues or adding additional pull-offs would change the character of these park avenues. In addition, widening the avenues as little as two feet on each side of the road would potentially impact archeological resources from the battle. Widening would change the historic appearance and alignment of the surviving original park avenues and it would adversely impact the monuments, markers, cannon, breastworks, stone walls, and trees that are adjacent to the avenue edge. In short, widening of the avenues has detrimental effects not only on the historic character of the avenues themselves but on a range of other contributing and significant resources as well.

-2-

a (cont.)

built before the days of the automobile seems foolish. Then to follow this with the suggestion that commercial tour busses will be the "best" way to get around is contradictory; if the roads are nov too small for cars, then how can they accommodate large busses ? Also the proposed reservation system controlling when visitors may go to certain areas of the park, the continual conversion to one way streets, street closures, etc. all seem to be more designed to discourage visitors than to accommodate them. Is this a part of some long range plot to someday eliminate visitors and their automobiles completely ? Why not welcome them and their automobiles by increasing these facilities where necessary instead of attempting to limit them ( maybe your Jitney busses will do this ) ? Why not encourage greater usage of this great historical region instead of trying to limit it ?

While thinking of the traffic "problem", I visited the park this year in April, July and again in August. Only during the July 4th holidays ( BIG reenactment) did I encounter any serious traffic problems and in none of these occasions did I feel that I was unable to visit wherever I pleased because of traffic. Somehow parking spaces always seemed to become available on Little Round Top. More, of course, would be nice but I found finding a place to stay to be a far greater problem... and not just on the July 4th holiday .

As I read this DRAFT PLAN the feeling kept coming through that the desire behind it all seemed to be to ultimately eliminate all traffic from within the park, except the busses of course; to make the battlefield become a "look only" museum rather than the "hands on" treasure it now is. Visitors, I suspect, may soon begin to find this revamped National Military Park less appealing. They may, in the future, even find themselves excluded completely, confined to some perimeter roadway with only specified pull over areas available from which they can view large portions of the field while listening to a "canned" explanation without ever setting a foot on this hallowed ground themselves. Far fetched ? Such designated areas are already being identifing in this DRAFT PLAN. Who knows what future use may be made of them . Of course you do hold out the option of relying upon ( for a fee ) commercial busses or cars employing a licensed battlefield guide, but it sounds as though you have plans to eliminate the private automobile when you are able.. I sure hope this is not what you are aiming for !

Park management is, I am sure, a difficult occupation. Whatever this difficulty, however, I feel it is wrong to "fight" your problems by hindering the visitors and to refuse any "expansion" of its historical content by refusing further

## COMMENTS

-3-

monuments or markers or to require reservations to traverse the park. I think the Park should find better ways to accommodate the visitors, to find reasonable solutions to these "growing pains" without compromising the visitors access to its every part, and to be open to possible expansion by accepting any appropiate new monuments or markers which could satisfy stringent rules for inclusion as well as adding to the general overall understanding of the events of July 1,2, and 3, 1863. When accepting a new monument, I feel that long standing traditions such as the position of horses' hooves ought to honored, as well as the strict requirements for accuracy of the monument's text.

b In conclusion, this DRAFT PLAN has left me with the feeling that the days when I as a "buff", or my son or my grandson can come and explore and snoop to our heart's content in an attempt to better understand this portion of our National History... a portion in which our direct ancestors participated... may well numbered. It almost seems as though the park is evolving into a playground for the professional historians only, that efforts on the part of the park to assist the visitor's understanding are scheduled to be curtailed, relying instead on the proposed new Visitor's Center to do the job. I fear that the Park may be on a course leading to its deterioration into something similar to the wax museum: pay your fee, walk through and look at the exhibits but don't touch, and out. No loitering, please.

To quote a former temporary resident of Gettysburg, it will be " a sad, sad day " if this should be allowed to happen to OUR park !

If my apprehensions seem frivolous, it is this DRAFT PLAN that has helped to create them. I am unalterably opposed to much of its thinking. Of the Alternatives offered, I must favor either Plan A coupled with better maintenance than is currently being provided; and if not that, then Plan B with the better maintenance and without the ill conceived new visitor center planned for a poor location .

In summary, I guess I like things as they are but with better maintenance. The glitz of a new Visitor Center is not going to enhance the historical value of Gettysburg National Military Park, and the many proposed changes ( eliminating / creating woodlots, relocating familiar facilities, etc.) will make it only marginally more understandable. After all, not much is currently being done to utilize the natural woods and fields about Pitzer Woods ( Wilcox/ Berdan ) to enhance a visitor's understanding, why should we expect that in the future when all is said and done that the Park Service will do any more ?

## RESPONSES

b The intent of this plan is to enhance the visitor's experience, expand the information database, and explore additional interpretive themes within the park and, therefore, make it easier for you and your family to visit all parts of the battlefield and understand them. This is stated in Section 1.3, park Purpose Statements: "To provide opportunities for people to learn about the Battle of Gettysburg in the full social, political and cultural context of the Civil War and American history." (p.5)

In our attempts to expand our interpretive themes, NPS feels that the best solution would be a new museum complex as outlined under Mission Goal 3: Visitor Use and Facilities, "Visitor safety and the quality of the visitor experience are affected by park programs, etc....Convenient park facilities, that do not harm or infringe upon park resources, and services and interpretive opportunities that are available when visitors need them are important to enjoyment of the park. Also important is developing a diversity of facilities and services that provides a range of appropriate activities...for park visitors."

-4-

And of course Congress will probably not be any more liberal with their budgets just because you have relocated and rebuilt some buildings and tree lots.

As I said in the beginning: I troubled.

Will future generations thank the park management if these proposed changes and limitations are imposed ? Will they be able to better understand the difficulties their brave ancestors faced, and the exemplary deeds they performed ?

I'm sorry to say, I fear not.

The money needed to implement these grandiose plans might better be spent in maintaining what WE already have.

Thank you for the opportunity of adding my "two cent's worth" about the future of my favorite place.

Sincerely ,

## COMMENTS

Dear Dr. Latschar,

I believe it is essential the General Management Plan be moved forward. I greatly appreciate the opportunity to comment and look to continued progress in refining this cherished resource.

Sincerely, John E. Sullivan III

Name JOHN E. SULLIVAN III

Address

## RESPONSES

**John E. Sullivan III**

Dear Dr. Latschar,

Words can barely express the importance of moving the General Management Plan forward. I appreciate the chance to be heard on the matter.

Sincerely,

Name Harold P. Swanger

Address

Harold P. Swanger

## COMMENTS

September 21, 1998

Superintendent John Latschar
Gettysburg National Military Park
97 Taneytown Rd
Gettysburg PA 17325

REF: Draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park

Dear sirs,

I am pleased to see the inclusion of bridle trails in the Master Plan Draft for the Gettysburg National Military Park. The historic role of the horse in the battle of Gettysburg merits the continued presence of the horse today at the battlefield. As your plan reported, the failure in the past to effectively manage maintenance of the trail system resulted in a negative portrayal of trail erosion. The inclusion of volunteer effort has made a very positive impact in the park's bridle trail conditions. Efforts of the Gettysburg Equestrian Historical Society with the park service has opened the opportunity for horse groups to do volunteer projects in the park trail system. These efforts have successfully demonstrated how erosion problems can be eliminated.

a The plan is too weak in describing specific steps to establish an all weather trail system to allow for the historic enjoyment of the park. Bridle trails should be given a higher priority in the Park Resources. This alternative transportation system is an excellent opportunity to ease congestion on the conventional access roads. Bridle trails can be used by hikers and horses to explore historic interpretation of the park through the historic methods of transportation of that era. Placing the trails along side the paved roads with motorized traffic diminishes the historic enjoyment of this alternative transportation visitor use group. Elimination of the trail to the Peace Light does not allow for trail visitor interpretation of the first day and Lee's headquarters area.

Specifics of the proposed trail placement were requested in public meetings. The Superintendent indicated that a detailed map would be provided in the Master Plan when map copies were requested. Modern trail system, Commemorative Resource Areas and historic lanes are not clearly defined. The map is unclear and marked as conceptual only with undetermined details. At public meetings, it has been requested to determine details. The proposed Master Plan has failed to establish a plan for the trail system. The Park's past years of failure to plan resulted in trail problems. Do not repeat the same mistake, but take positive action in the Master Plan to establish all weather trail systems.

Though I understand the desire to limit recreational use, the Park has ignored the excellent opportunity to reduce traffic congestion by supporting alternate transportation methods to historically view the park. I would encourage the Master Plan to include investigation of recreation trails program funding in the Transportation Equity Act for the 21st Century (TEA-21) passed by Congress. The Master Plan in it's current draft is incomplete and not indicative of past public input in General Master Plan meetings. I appreciate the opportunity to assist in development of the Master Plan and hope the final draft will be inclusive.

Sincerely,

Jean Swartz

Jean Swartz

## RESPONSES

### Jean Swartz

a The General Management Plan is used to set forth a basic management philosophy for the Gettysburg National Military Park and provide a framework for future decision-making. Where they are needed, implementation plans would be developed to determine site specific locations for the horse trail. Final locations of horse trails have not yet been determined. Throughout the process, park managers would involve the public to ensure a smooth transition from the old to the new. Final locations of horse trails have not yet been determined.

**Paul R. Szymanowski**

October 18, 1998

Dear John,
I support the new general management plan for Gettysburg National Military Park.

Sincerely,
Paul Szymanowski

## COMMENTS

**Dear Dr. Latschar,**

It is very important that the General Management plan moves forward.

We appreciate the opportunity to be heard.

Sincerely,

Name Tannery Bed & Breakfast

Address

## RESPONSES

**Tannery Bed & Breakfast**

Dear Dr. Latschar,

It's important that the General Management Plan move forward

We appreciate the opportunity to be heard

Sincerely,

Name Steve J. Taper

Steve J. Taper

## COMMENTS

Robert A. Tarr

October 26, 1998

To Whom It May Concern:

I am writing about the Draft General Management Plan and Environmental Impact Statement of Gettysburg National Military Park of Pennsylvania, August 1998. Currently I am a Park and Resource management major here at Slippery Rock University and would like a copy of this plan. I have a great interest in the Civil War and the history that goes along with that period in history, and would love to see the battlefield as it was in 1863. Thank you for your time and consideration.

Sincerely,

Robert A. Tarr
Parks and Resource Management Major

a P.S.,
..... Just out of personal curiosity, I have some questions about this project. When you return this area to the state it was in as of 1863, how would visitors be transported throughout the field?

## RESPONSES

### Andrew Taylor

a Automobiles and bicycles would continue to use the park avenues, as they do now, to reach battlefield sites. Also available would be pedestrian trails and horse trails, using the system of lanes present in 1863. This is described on pages 91-94 of the draft GMP/EIS.

13 October, 1998

NPS:

a The proposal to log 600 acres is excessive. The park's forest wildlife would be harmed. Neotropical songbirds such as the wood thrush and black-throated green warbler would lose breeding habitat, while transients such as the blackpoll warbler would lose stopovers.

The park should not be part of the deforestation problem.

Sincerely,
Andrew Taylor

## Andrew Taylor

a You are correct in stating that the wooded areas of the park provide habitat for a variety of wildlife species including many neotropical migrant birds. The plan does not call for the complete removal of all wooded areas on the park, only areas that were not wooded in 1863. The areas proposed for tree removal would be rehabiliated as pastures or meadows and they in turn would provide habitat for a different group of birds such as northern harriers (marsh hawks), short-eared owls, upland sandpipers, bobolinks, and other birds that use grasslands for their breeding grounds and migratory stopovers. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed, threatened or endangered species.

## COMMENTS

Author: "Tom D." at NP--INTERNET
Date: 10/8/98 2:43 PM
Priority: Normal
BCC: GETT Superintendent at NP-GETT
TO: <"GETT_Superintendent@nps.gov" at NP--INTERNET
Subject: New visitor center
---------- Message Contents ----------

Hello. I found this site in a civil war newsgroup and just wanted to add my 2 cents about the new visitor center idea. I visit Gettysburg many times a year and think the park is fine just how it is. Sure, making it appear more like it did in 1863 would be nice but at what cost? I do lots of traveling and have seen far too many tourist areas cut their own throats by making "improvements". Is it me or does the government go out of its way to find more ways to waste money much needed elsewhere? Just my opinion.
Tom

## RESPONSES

### tcdhart

John Latschar, Superintendent
GMP
97 Taneytown Rd.
Gettysburg, PA 17325

October 9, 1998

To Mr. Latschar and the Community:

a Any Late 20th Century person with a brain knows of the critical balance maintained by trees against toxins in our ecosystem. Gettysburg's rampant development, traffic (local & route 15) and pollution levels have increased irrevocably since the Civil War. Those acres of trees which have grown, part of Earth's healing process, on the battlefield are needed more than ever. To cut

b them down, just to fill some lack of imagination, values & vision by some hardcaore historians, is both idiotic and outrageous! You may as well commit yourselves to daily spilling of human blood over the battlefield to be "historically correct." How about rotten flesh and disease, too? We also now know that 19th Century farming practices weren't always the most ecologically sound, either.

Let's INTERPRET history, not try to recreate it, mistakes & all!

Many other valid points have been made against this massive cutting of trees - consider wildlife, erosion, aesthetics, expense & commotion of the process.

P.S. Hasn't anyone else noticed how similar the Cyclorama building is to the award-winning Brandywine Art Museum? It just needs to be faced in stone! On-site expansion is less expensive, more practical. Reduce, Reuse, Recycle...Buildings, too. RE-THINK!

Andrea M. Theisson

Andrea M. Theisson

cc John Latschar, GMP
The Evening Sun
The Gettysburg Times

659

## Andrea M. Theisson

a You are correct in stating that trees assist in maintaining a viable ecosystem. Trees use primarily oxygen and carbon dioxide during their respiratory and photosynthetic processes. Carbon monoxide and ozone are the two substances that are of greatest concern for automobile emissions. The Gettysburg area complies with the National Ambient Air Quality Standards and all state air quality standards for carbon monoxide. However, it does not meet those standards and is a marginal non-attainment area for ozone. Ozone pollution is not unique to the Gettysburg area, but is of concern for the entire eastern United States. To be an attainment area for ozone, a site cannot exceed the standard more than three times over a three-year period. The source of ozone in the region is from vehicle emissions along the East Coast, and from major stationary sources of nitrogen oxide emissions in the Ohio River valley. The emissions from private vehicles driving through the park are minimal compared with the larger regional emissions. The Pennsylvania Department of Environmental Resources has concurred that actions within the park have minimal effects on regional air quality.

The draft GMP/EIS indirectly addresses air quality by proposing alternate transportation (some type of shuttle system) to high volume areas, such as between the museum facility and the most highly visited sites (Soldiers' National Cemetery, Little Round Top, Angle, Peach Orchard, Peace Light Memorial.) This proposal is included in all three of the action alternatives (Alternatives B, C, and D). Currently, the park requires all buses to shut their engines off at these highly visited sites in the park to help reduce local emissions. Because ozone pollution is more of a regional issue than a local one, the park would continue to consult with the state and reduce auto emissions through the implementation of a shuttle system.

b NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help Gettysburg NMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the

| COMMENTS | RESPONSES |
| --- | --- |
| | most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive rangers are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible. |

**Dear Dr. Latschar,**

IT is important that the General Management Plan move forward at GNMP
I appreciate the opportunity to be heard - Thank You

Sincerely,

Name Arnold G. Thibodeau

Address

**Arnold G. Thibodeau**

| COMMENTS | RESPONSES |
| --- | --- |
| 10-12-98<br><br>Dear Dr. Latschar:<br>This is just a quick note to let you know that I support your project for a new visitor's center and museum through the public/private partnership. I also support your new Gettysburg National Military Park General Management Plan. Your idea to restore the park to its 1863 appearance is excellent and it will add so much to the interpretation.<br>Thank you for all your hard work and please rest assured that we here in North Carolina greatly appreciate your kindness and dedication.<br><br>Your obedient servant,<br>Robert C. Thomas | Robert C. Thomas |

## Susan G. Thomas

October 14, 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg PA 17325

Dear Dr. Latschar:

This letter is to voice my approval in full support of the proposed plan for a new visitor center at Gettysburg National Military Park. In addition, I extend my full support for the proposed general management plan.

I am confident that you and your entire staff are committed to making Gettysburg National Military Park one of the best in the country. Generations to come will reap the benefits of your hard work.

Thank you for all you do in the best interest of the American people.

Sincerely,

Susan G. Thomas

Susan G. Thomas
Mary Custis Lee Chapter #6
Order of Confederate Rose

## COMMENTS

Dear Dr. Latschar,

You know I support the overall plan 100%. Enjoyed talking with you at the 1st Corps Dinner. Probably be back in the Spring.

Good luck,

Sincerely,

Name Fred Thompson

Address

## RESPONSES

**Fred Thompson**

| COMMENTS | RESPONSES |
| --- | --- |
| Author: GaryT at NP--INTERNET<br>Date: 10/12/98 7:45 PM<br>Priority: Normal<br>TO: GETT Superintendent at NP-GETT<br>Subject: Gettysburg National Military Park Management Plan<br>---------- Message Contents<br>After careful consideration, I too favor Alternative Plan C, the proposed plan.<br>Thank you for this opportunity to express my opinion. | **Gary Thompson** |

## COMMENTS

Dear Dr. Latschar,

WHAT IS THE CURRENT STATUS OF THE GENERAL MANAGEMENT PLAN FOR GETTYSBURG NATIONAL PARKS? PLEASE HELP MOVE PLAN FORWARD. WE DO APPRECIATE OPPORTUNITY TO BE HEARD THANKS!

Sincerely,

Name JOHN A. TILLEMA

Address

## RESPONSES

John A. Tillema

Author: at NP--INTERNET
Date: 10/16/98 1:31 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: General Management Plan
---------- Message Contents

Dear Dr. Latschar,

Having read the draft General Management Plan and the proposal for the new Visitors' Center in information sent to me by the Friends of the National Parks at Gettysburg, I would like to voice my support for these documents and recommendations. In the past year I have had the opportunity to discuss the condition and needs of the Park with many concerned people, and have also visited many parts of the Battlefield. It is clear to me that much needs to be done as soon as possible to restore both the grounds and the monuments at Gettysburg. Based on what I have read and talked about with others, I believe that the above mentioned plans would be the most effective means of guaranteeing that Gettysburg will continue to educate future generations of Americans.

I hope that this letter will aid you in your efforts to insure the preservation of the national treasure at Gettysburg National Military Park. If I can be of assistance in any other way, please let me know.

Very Sincerely,
Teresina S. Toepke
Virginia State Representative
Longstreet Memorial Fund

## Teresina S. Toepke

## COMMENTS

Henry V. Trippe

October 5, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, Pennsylvania 17325

Dear Dr. Latschar;

Having been unable to attend any of the public meetings or workshops on the proposed General Management Plan, my wife and I never-the-less have a great interest in the future of the Gettysburg Military Park. We thank you for the copy of the General Management Plan and Environmental Impact Statement which I have studied for some time. It is our belief that the Plan labeled as Alternative C has the greatest benefit to the Park. We therefore urge all to accept this proposal and work toward the goal of increasing the protection and resources of the Gettysburg National Military Park

We sincerely thank you for the opportunity of expressing our opinion. Our visits have all ways been enjoyable as well as informative.

Yours very truly,

Henry V. Trippe, Jr.

## RESPONSES

### Henry V. Trippe, Jr.

**Dear Dr. Latschar,**

My wife and I join the ranks of many thousands who feel the importance of the General Management Plan for the Gettysburg National Military Park and urge all to help move it forward. We sincerely appreciate the opportunity of being heard.

Sincerely,

Name Henry V. Trippe & Wilma E. Trippe

Address

## Henry V. & Wilma E. Trippe

## COMMENTS

Dear Dr. Latschar,

I HAVE AN IDEA FOR RAISING FUNDS ASK THE STATE TO PUT OUT A CIVIL WAR LOTTERY TICKET FOR 3 MONTHS AND ALL MONIES WOULD GO FOR THE BATTLEFIELD UPKEEP

Sincerely,

Name FRANK A. TROIANI

Address

## RESPONSES

**Frank A. Troiani**

## Allan Tulp

Author: at NP--INTERNET
Date: 10/6/98 5:05 PM
TO: GETT Public Affairs Office at NP-GETT
Subject: re:The GMP and EIS
---------- Message Contents

Dear Sirs,
I am a member of the GDG and a serious student of the CW. Not a professional historian but a perso who is very concerned about your plight. I visit the park often, this year 3 times. I don't think it takes much knowledge to realize that a new VC& C is needed.
I am now 68 years old and I would like to continue coming to the park but the facilities are outdated.
I realise that Congress will not appropriate the funds needed and therefor approve your plan to enter into an agreement witha private entity , namely Kinsley.
I do wish you all the best and hope that I could at sometime in the future visit a more regenerated park.

Kind regards,
Allan Tulp

lineman extraordinaire

## Saul Eric Uberman

*C.M. Uberman Enterprises*

October 1, 1998

Superintendent
Gettysburg National Military Park
Gettysburg, Pennsylvania 17325

Re: Draft, General Management Plan - Gettysburg
Presented at the NPS Public Hearing

We are presenting for formal record various letters, documents, newspaper articles all which have to do directly with the General Management Plan and its process. These documents should be made part of the permanent record of this General Management Plan as the Park has assured us.

We Enter For the Record and part of the GMP:

1. August 3, 1998 Senator Spectors letter to Secretary Babbitt asking for an extension to the Public Review Period.
2. August 4, 1998 Congressman Goodlings letter asking for an extension to the Public Review Period.
3. The September 23, 1998 Letter to Secretary Babbitt from Senators Jeffords, Lott, and Torricelli
4. The September 25, 1998 letter to the above Senators thanking them and pointing out that: The NPS's own Management Policies state very clearly that "If adequate facilities exist or can feasibly be developed by private enterprise to serve park visitors' needs for commercial services outside park boundaries, such facilities will not be expanded or developed within Parks."
5. A partial list of those businesses within a 2/5 mile walking distance of the current Visitor Center. These businesses will no longer be in walking distance in Alternatives B, C. or D.
6. September 25, 1998 Memo from Senator Santorum which, unfortunately and in error, mis-represents the facts by playing loose with the English language; semantics if you will, not facts.
7. September 28, 1998, Our letter of clarification to Senators Santorums Memo.
8. September 24, 1998, Senators Lotts letter to Secretary Babbitt using the Santorums Memo as facts.
9. September, 1998 Memo on the Economic Impact Evaluation, its short comings and its purposeful lack of information.
10. September 25, 1998 letter to Congressman Goodling, at his request, outlining the 19 points of confusion and mis-representations created by the Park Service. **The Park Service should consider each of these points as legitimate questions to the General Management Plan.**
11. The Fall Friends letter in which its President states, in his confusion, that Kinsley himself will build the Kinsley Visitor Center.

Page Two
October 1, 1998

12. The September 16, 1998 published observation of the Vice-Chairman of the Gettysburg National Military Park Advisory Commission.

Although the Draft Management Plan has three action alternatives, each alternative is the same when it comes to the Kinsley Visitor Center its location, its size, and its commercial aspects. No choice is given. In fact, the Park Service has predetermined, without alternatives, the most controversial aspect of the General Management Plan. The Park Service has taken the hard work of others within the Park system for the GMP and made them vulnerable with the Kinsley, no-alternative, proposal.

It is for this, as well as, many other aspects within the GMP, that the Draft General Management Plan its it current form should not be accepted.

Mis-information, confusion, the play on words (semantics), delays, information released only through Freedom of Information Act Requests, are the hallmark of this General Management Plan and are in-them-selves reason enough that this Plan not be accepted.

In closing we ask why the National Park Service in Washington trust the original commercial "partner" Kinsley and Gettysburg National Military Park after the scandalous arrangement they originally tried to foist on the public?

Can the National Park Service in Washington trust the Gettysburg National Military Park to protect the national interest at Gettysburg after its disgraceful performance thus far?

Why does Gettysburg National Military Park turn a deaf ear to our elected Congressional leaders, the media, citizens, Civil War organizations, local elected officials, and others to the clear refrain of "no commercial facilities in the Park"?

Why is there no alternative to the Kinsley Visitor Center aspect within the General Management Plan?

Is the Gettysbuirg National Military Park listening? Does the National Park Service in Washington care?

Sincerely,

Saul Eric Uberman

enc:12

09-23 98 14:03 FAX FAX 3. 001
09/23/98 WED 12:30 FAX JEFFORDS DC 001

United States Senate
WASHINGTON, DC 20510

September 23, 1998

The Honorable Bruce Babbitt
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Babbitt:

We are writing to express our concern with an attempt by the National Park Service (NPS) to allow a private developer to construct and operate a visitor complex with for-profit concessions within the boundaries of the Gettysburg National Military Park.

The proposed project, known as the Kinsley proposal, will cost approximately $40 million. The NPS claims that the existing facilities at Gettysburg are old and inadequate and that a new visitor center is needed. We understand the need for and importance of a new visitor center. The treasures at Gettysburg and other National Parks are priceless and need to be saved, intact, for future generations. However, the proposed plan commercializes the very ground and principle we strive to preserve.

The Kinsley proposal allows a large screen theater, gift shop, cafeteria, sit-down restaurant and bus terminal on a piece of terrain that is, according to historians, the last part of the battlefield that has lain totally undisturbed since the conflict. In addition, the controversial privately-owned National Tower will receive a new lease on commercial life through this project.

Our concerns are shared by organizations and groups interested and dedicated to the preservation and protection of our nation's most sacred places. In fact, the plan is unanimously opposed by the Borough of Gettysburg, the Gettysburg Area Retail Merchants Association, the Gettysburg Convention & Visitor's Bureau and the overwhelming majority of Civil War organizations. These include the Association for the Preservation of Civil War Sites, Gettysburg Battlefield Preservation Association, Civil War News and the National Congress of Civil War Round Tables.

The National Park Service has the responsibility to maintain the honor of our nation's most significant resources. It is in this country's best interest that you fully understand and evaluate the potential impact of the commercial proposal on the Gettysburg National Military Park before you proceed. This is an issue of great importance and

The Honorable Bruce Babbitt
September 23, 1998
Page 2

significance to the American people and United States Congress. We ask that you delay this precedent setting project to review the consequences of commercializing our nation's heritage and reconsider the project in a different form.

Congress and those who manage our national lands have a challenge and obligation to preserve and protect the fragile bits and pieces of our nation's history that remain with us today. If we fail to maintain the integrity of the most hallowed ground on which this nation's history was written, we must answer to future generations who will go in vain to seek places of our heritage. We look to your leadership and courage to help protect our priceless and unique areas of national heritage.

Sincerely,

James Jeffords

Robert Torricelli

Trent Lott

4.

*C. M. Uberman Enterprises*

September 25, 1998

Senator Trent Lott
United States Senate
Washington, D.C.

Senator James Jeffords
United States Senate
Washington, D.C.

Senator Robert Torricelli
United States Senate
Washington, D.C.

Dear Senators,

We want to thank you for your efforts on behalf of the many Americans deeply concerned about the proposed commercialization of Gettysburg National Military Park.

As members of this community, we take the sanctity, and the success, of the Park very seriously. In our view there is a deep symbiosis that exists between the Park and the community of Gettysburg. The ties between us are many, and have developed in concert over the last 135 years. We fear that the proposed development plans for Gettysburg National Military Park will bring irreparable harm to the futures of both the Park and our community.

Your letter to Secretary Babbitt clearly and eloquently delineates the very real concerns regarding commercialization of this most hallowed ground. It speaks not only for the local residents and municipalities, but for a far-reaching network of Americans who care deeply about this place and what it means to our development as a nation.

We can imagine that your arguments against commercialization will generate substantial rebuttal from the current administration of the Park and their supporters. Please don't allow the semantics regarding the commercial elements of the proposed Visitor Center and commercial services facilities obscure the facts: a movie theater that seats 225 people is being proposed; a 300 seat eating facility is being proposed; a tour bus center is be proposed: and, a significant expansion of the current book/gift shop is being proposed. These represent new and, in the case of the book and gift sales shop expanded commercial enterprises that will be built on some of the last untouched land on the battlefield, and that will compete directly with small business enterprises in the area that have been providing these services for many decades.

The last point is crucial, as it points to a serious flaw in the development plans that has been for the most part glossed over, and which represents another area of great concern. The proposed commercial development plans have created a huge rift between the Park and its neighboring communities. The commercialization is a serious factor in the rift. In addition, and in some ways more significantly, the proposed location itself will have far-reaching negative impacts on the borough of Gettysburg and its residents and businesses.

The National Park Service's own Management Policies state very clearly that If adequate facilities exist or can feasibly be developed by private enterprise to serve park visitors' needs for commercial services outside park boundaries, such facilities will not be expanded or developed within parks. Over the course of at least the past fifty years, if not longer, a host of small businesses, all locally owned and operated, have emerged to provide a full range of services to visitors to Gettysburg National Military Park, the National Cemetery and, more recently, the Eisenhower Farm. Today, no fewer that 104 small- to medium -sized businesses are operating within walking distance--literally within two-fifths of a mile--of the current Visitor Center, Cyclorama and National Cemetery. Walking traffic is essential to their survival.

By locating the proposed Visitor Center and commercial services facilities outside of the core commercial district, and creating a more captive and controlled visitor environment, and competing directly with the services provided by small business in the area, the Park Service will be ripping the heart out of the existing local economy. These businesses, employing local residents and representing a substantial core of Gettysburg's local tax base, will suffer tremendously if the proposed commercial services plans for the Park are pursued. The borough of Gettysburg with less than 50% of its real estate on the tax rolls and depending upon the taxes generated by the tourist industry, will suffer equally. We believe, sadly, that this kind of management and facilities development planning is at cross-purposes with any spirit of cooperation and mutual dependence and benefit that should exist here in Gettysburg and anywhere where National Parks and other National treasures are closely linked with local communities.

Page Three
September 25, 1998

At this stage, we are witnessing a National Park at war with its neighbors, at a place where war among neighbors in this country was supposed to laid to rest, forever. The weapons are misinformation and attempts to pit residents and constituents against one another. Semantics, not truth, are offered for daily consumption (Is a movie theater a movie theater or not? Is a cafeteria a place to serve food, or not?) Many of us are left to feel that our elected officials are siding with bureaucrats and not voters. We were excited and encouraged by your correspondence to Secretary Babbitt, as what we want, and need, is to be heard by honest and objective officials.

This plan that is being ram-rodded through must be stopped and re-examined. The rifts in our communities and between our communities and Gettysburg National Military Park must be healed. We gratefully applaud you for your courageous stand on behalf of the Park, and ask that you continue to apply this pressure on behalf of all Americans.

Sincerely,

Saul Eric Uberman

CONCERNED CITIZENS FOR GETTYSBURG

cc: Senator Rick Santorum
Senator Arlen Specter
Congressman Bill Goodling

6.

RICK SANTORUM
PENNSYLVANIA

United States Senate
WASHINGTON, DC [illegible]
[illegible]

# Memo

September 25, 1998

TO: Sen. Trent Lott / Sen. Jim Jeffords / Sen. Bob Torricelli
FR: Sen. Rick Santorum

RE: Gettysburg National Military Park

Below please find information regarding the ongoing consideration of the new visitor center proposal at the Gettysburg National Military Park.

This information should answer questions and concerns raised in your 9/23/98 letter to Secretary Babbit. These matters have been part of the public domain and discussion for some time. In particular, I draw your attention to a July 16 letter of intent between the National Park Service and Mr. Kinsley, as well as the August 1998 General Management Plan. These materials should help answer the following concerns from your letter:

#1) 9/23/98 letter to Secretary Babbitt:
"..the proposed plan commercializes the very ground and principle we strive to serve."

* A July 16 letter of intent refined the proposal removing all commercial aspects of the proposed visitor center. See GMP pages 22 through 25 and an attached June 17 plan summary of the draft GMP.

#2) 9/23/98 letter to Secretary Babbitt:
"The Kinsley proposal allows a large screen theater, gift shop, cafeteria, sit-down restaurant and bus terminal on a piece of terrain that is, according to historians, the last part of the battlefield that has lain totally undisturbed since the conflict."

* Refinements outlined in the July 16 letter of intent announced that changes were being made due to public comment and opinion, resulting in:
  - removal of the IMAX theater;
  - a reduced (by half) cafeteria and elimination of sit down dining;
  - elimination of all commercial gift shop and stores;

* July 16 letter of intent and August 1998 GMP contain no considerations for a "bus terminal."

World Wide Web: http://www.senate.gov/~santorum

| COMMENTS | RESPONSES |
| --- | --- |
| #3) 9/23/98 letter to Secretary Babbitt:<br>"The Kinsley proposal allows a large screen theater, gift shop, cafeteria, sit-down restaurant and bus terminal on a piece of terrain that is, according to historians, the last part of the battlefield that has lain totally undisturbed since the conflict."<br><br>• Focus of September 9 public meeting at Gettysburg was on Land and Resource Management at the Park. Topic throughly addressed and discussed through presentation by Park archeologists and historians, and later question and answer from the public. NPS officials have confirmed that no battle action occured nor was there any bloodshed at the proposed site. | |
| #4) 9/23/98 letter to Secretary Babbitt:<br>"In addition, the controversial privately-owned National Tower will receive a new lease on commercial life through this project."<br><br>• The letter of intent, the visitor center proposal, and the GMP make no lease arrangements with the National Tower. The record from public meetings over the last year contains repeated questions and answers regarding the National Tower. That record reflects statements by Park personnel that no arrangements have been made with the owner of the Tower. The record further reflects the interest of the Park to see the Tower removed. | |
| #5) 9/23/98 letter to Secretary Babbitt:<br>"Our concerns are shared by organizations and groups interested and dedicated to the preservation and protection of our nation's most sacred places. In fact, the plan is unanimously opposed by ....."<br><br>• My August 7 letter to the Mayor of Gettysburg, Mr. William Troxell, stated that the majority of constituent opinion and mail I have received remains overwhelmingly positive with respect to the new visitor center proposal. This analysis includes letters and input I've received in opposition from those groups mentioned in the 9/23/98 letter to Secretary Babbitt.<br><br>• An overall assessment of my constituent input and reaction has been supportive and positive. The constituent input has come mainly from the Gettysburg area, with expressions of support from many Gettysburg businesses. | |
| It is my understanding that the offices of Senator Jeffords and Torricelli are part of the Park's public mailing list, as is my office. As such, you should have received a copy of the General Management Plan, meeting announcements, and other material. I will forward to the office of Senator Lott copies of this material.<br><br>I hope this helps clarify developments and the status of the visitor center proposal. | |

7.

*C. M. Uberman Enterprises*

September 28, 1998

TO: Senator James Jeffords
Senator Robert Torricelli

FROM: Eric Uberman

RE: Gettysburg National Military Park

This memo will show that there is continuing confusion about the Park Service proposal for Gettysburg National Military Park:

1. "...the proposed plan commercializes the very ground and principle we strive to serve."

2. "The Kinsley proposal allows a large screen theater, gift shop, cafeteria, sit down restaurant and bus terminal on a piece of terrain that is, according to historians, the last part of the battlefield that has lain totally undisturbed since the conflict."

A. Page 89 of the GMP states - Visitor Center would provide a 300-seat cafeteria style restaurant. This would be one of the largest, if not the largest commercial eating facility of its kind in Gettysburg.

B. The GMP does not state that this is a non-profit food service. It is immaterial if the food service is or is not for profit - it is in fact a commercial enterprise which will be used to divert those customers already using food services in Gettysburg to the Kinsley complex.

C. On page V-18 of the Economic Impact Evaluation, "Estimated Pro Forma Operating Projection", states that the food service [cafeteria] will pay to the Foundation rent in the amount of $180,000 and a Building Operations Fee of $25,481 per year.

D. Commercial Retail Space - The retail space still exist but has put on "the beard" of a 501(c)3 of Eastern National Parks to hide the fact that economic impact upon the retail community of Gettysburg will again be devastating. 6,000 square feet of retail space is 6,000 square feet of retail space. No-matter who the operator is the effect is the same. The intent is to cannibalize taxpayers businesses.

## COMMENTS

## RESPONSES

Page Two
September 28, 1998

E. The IMAX theater is removed but a commercial theater is still placed on the battlefield. There are those who would suggest that "semantics" are being used to fool those in Congress. We believe that to be true as well. A theater which expects to do the underestimated minimum gross of $1,043,302 (pg V-18 Economic Impact Evaluation) is by no means a small theater. A commercial theater on the battlefield is a commercial theater on the battlefield. Mr. Kinsley has stated that the theater will show movies other than the National Geographic produced movie, during and after the dinner hour and into the evening. This commercial existence will cut into the private entertainment and museum business already in place in Gettysburg.

F. There is in fact a commercial bus terminal. On page 30 of the GMP, it states that 4,000 square feet will be allocated for the "Tour Center". On page V-18 of the Economic Impact Evaluation, "Estimated Pro Forma Operating Projection", it show the "Tour Center" paying $100,000 at the minimum to the Foundation for rent. Mr. Kinsleys' "Partner" Mr. Tom Metz owns and operates Gettysburg Bus Tours, which will have a large presences at this commercial facility.

3. "The Kinsley proposal allows a large screen theater, gift shop, cafeteria, sitdown restaurant and a bus terminal on a piece of terrain that is, according to historians, the last part of the battlefield that has lain totally undisturbed since the conflict."

A. This is correct, in fact the Park Service's own review document speaks of "artillery positions" on this property. One has only to see this property to understand its pristine nature.

4. " In addition, the controversial privately-owned National Tower will receive a new lease on commercial life through this project."

A. This is a mistake in the reading of the sentence. By moving the proposed Visitor Center closer to the Tower it would give the Tower a "new lease on <u>commercial</u> life.." not a legal lease or document concerning itself with property. This is confusion, just to make a point.

Page Three
September 28, 1998

5. "our concerns are shared by organizations and groups interested and dedicated to the preservation and protection of our nation's most sacred places. In fact, the plan is unanimously opposed by..."

A. All the groups and organizations mentioned were and are "of record" with the current GMP to their elected Federal officials. These groups, organizations and the Borough of Gettysburg can be contacted directly for their comments. We know that each will cooperate.

We close this memo by stating that we have shown the Park Service that the current proposal will knowingly take over $15,000,000 out of the business community and the tax base of Gettysburg through its commercial activities to support the Kinsley Visitor Center. We look to our leaders to help us, not compete against us.

09/28/98 15:06 ☎ SEN SANTORUM 002

8.

# United States Senate

WASHINGTON, DC 20510

September 24, 1998

The Honorable Bruce Babbitt
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Babbitt:

I am writing as a follow-up to a letter dated September 23 regarding the Gettysburg National Military Park (NMP).

My letter articulated concerns with the ongoing consideration of a new visitor center at the Gettysburg NMP. The letter shared concerns with potential commercial aspects of the new center. In addition, it expressed concerns with the location of the center itself as potentially jeopardizing hallowed ground on the battlefield.

I have subsequently been made aware of a letter of intent signed on July 16, 1998 by the Park Service and the selected developer, Robert Kinsley. I have also been made aware of the Park's General Management Plan (GMP) currently under a sixty-day public comment period. This information outlines various adaptations that have been made to the original proposal through the July 16 letter of intent and contained in the public GMP document.

In particular, I understand the food service operations have been reduced by half with no sit down dining, the proposed IMAX theater has been removed, and all commercial gift shop operations have been eliminated from the plan. Further, I understand that historical and archeological studies have been done and that there was no battle action nor any bloodshed at the proposed site. I have also been advised that the National Tower and a bus terminal are not part of this project.

Through this information and commitments I have received from Congressman Bill Goodling and Senator Rick Santorum, I am confident that the concerns I shared are being adequately addressed. I am encouraged by the changes to the original proposal and the ongoing public comment opportunities made available by the Park Service.

Our national and cultural heritage remains very important to me, and I encourage a continued public discussion of this proposal.

Thank you for your attention to this letter..

Sincerely,

Trent Lott

Trent Lott

9.

*C. M. Uberman Enterprises*

DATE: SEPTEMBER 1998

ECONOMIC IMPACT EVALUATION
GETTYSBURG NATIONAL MILITARY PARK
GENERAL MANAGEMENT PLAN ALTERNATIVES
Prepared by: The offices of Thomas J. Martin August, 1998

a DOCUMENT PROVIDED BY FOIA REQUEST

Thomas Martin, employed by the National Park Service, to formulate the Economic Impact Evaluation supplied a flawed report to the citizens. At the work shop held by NPS, Mr. Martin was challenged on each point. Mr. Martin found it very difficult to stand behind his numbers. This workshop was not for the record and no recordings of this meeting were taken and Mr. Martin will not appear at any meetings "for the record".

b First, please draw your attention to page I-2 were Mr. Martin states that "No warranty or representation is made that any of the projected values or results contained in this study will actually occur.". We can rest easy that Mr. Martin claims no responsibility for a report that NPS is basing all commercial activity on as well as assuring the community it has nothing to worry about.

c No "primary" research is done by Mr. Martin. All information is given to him by NPS Gettysburg. Some number are simply "plugged in" as told to those who attended NPS Workshops. The transparent results of Mr. Martins study give the NPS Gettysburg the numbers which they contracted him for, "as directed". This is not an independent study but a study done for a client wishing to sell a commercial project, the Kinsley Project.

It is entirely clear that once the true numbers of the commercial aspect of the Kinsley Visitor Center are known, it will show that the cannibalization from the existing community may be in excess of over $15,654,000.00

a The document referred to here was made available to the public when the draft GMP/EIS was released to the public on August 14, 1998. Since a FOIA request for the document was made, it was also provided under FOIA.

b This is a standard legal disclaimer used in professional economic reports. NPS considers that the report is an accurate and thorough assessment of the impacts of the alternatives considered in the draft GMP/EIS.

c Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP/EIS and the 12 meetings on the draft DCP/EA, as were representatives of local municipalities. Appendix 10 demostrates local business and municipal attendance at the GMP workshops. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5 lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

## COMMENTS

DOCUMENT [EIE] PROVIDED BY FOIA REQUEST

ECONOMIC IMPACT EVALUATION
PREPARED BY: THOMAS MARTIN

PAGE V-16

| | |
|---|---|
| REVENUES: CAFETERIA | $1,458,713.00 |
| CAFETERIA RENT PER SQ.FT. | 30.00 |
| SHARED SERVICES PER SQ.FT. | 4.25 |

d THE $30 PER SQ. FT. RENT FACTOR REPRESENTS 12% OF GROSS SALES. THIS PERCENTAGE FOR RENT IS UNHEARD OFF IN THE FOOD INDUSTRY, IF ONE LEASES SPACE THAT HAS TO BE BUILT-OUT [FLOOR,CEILING, WALLS, EQUIPMENT, ALL FURNISHING].

IN REALITY A FOOD SERVICE WOULD BE CHARGED A 5% OF THE GROSS AND THE LEASE WOULD PROVIDE FOR A OVERAGE RENT FACTOR.
BUT WHAT HAPPENS WHEN A REAL NUMBER IS USED?
.05% OF $600.00 IS $30.00. IF WE USE $600.00 AS THE BASIS PER SQUARE FOOT THAN THE TRUE FOOD REVENUE AT THE MINIMUM CAN BE MEASURED AT: $600.00 x 6,000 SQ. FT. = $3,600,000.00
THE PARK SERVICE EXPERT UNDERESTIMATES FOOD SERVICE BY OVER $2,000,000.00.

**THE MINIMUM THREAT TO THE COMMUNITY IS $1,600,000.00 OF LOST REVENUE.**

## RESPONSES

d NPS considers that the percentages used are reasonable. They generally represent the lower end of percent of gross sales for food service charged in museum settings.

DOCUMENT [EIE] PROVIDED BY FOIA REQUEST

ECONOMIC IMPACT STUDY
PREPARED BY: THOMAS MARTIN

V-14

| | |
|---|---|
| EASTERN NATIONAL BOOKSTORE REVENUE | $ 2,632,500.00 |
| EASTERN NATIONAL MUSEUM STORE REVENUE | $ 2,113,313.00 |
| TOTAL | $ 4,7745,813.00 |

e

IF WE ARE TO ASSUME THAT EASTERN IS A SOPHISTICATED RETAILER THAN EASTERN TAKES SPACE BASED ON WHAT IT CAN REALIZE PER SQUARE FOOT. EASTERN STATED THAT IT CURRENTLY DOES $1,085.00 PER SQUARE FOOT AT THE VISITOR CENTER. IF WE MULTIPLY THE REVENUE DOLLARS PER SQUARE FOOT [USING EASTERNS NUMBERS] BY THE SQ. FT. OF SPACE LEASED WE SEE ANOTHER PICTURE.

$1,085.00 x 6,000 SQUARE FEET = $6,348,000.00

THOMAS MARTIN UNDER ESTIMATES REVENUE BY $1,602,187

WE MEASURED THE CURRENT EASTERN SHOP AT THE VISITOR CENTER. WE SHOWED LESS SQUARE FEET OF RETAIL SPACE THAN EASTERN. WE SHOWED THAT EASTERN IS CURRENTLY GROSSING $1,814.00 PER SQUARE FOOT. USING THE BASIC FORMULA: $1,814.00 x 6,000 SQ FT. = $10,884,000

THOMAS MARTIN UNDERESTIMATES REVENUE BY $6,138,187

THE MINIMUM THREAT TO THE ECONOMIC COMMUNITY COULD BE MORE THAN $10,000,000.00 OF LOST REVENUE

e NPS uses per capita, not per square foot, figures to calculate actual sales in its book and museum stores. This is standard industry practice, and is recommended for use in museums by the Museum Store Association. NPS considers that per capita figures provide accurate information for estimating impacts.

## COMMENTS

a (cont.)

DOCUMENT [EIE] PROVIDED BY FOIA REQUEST

ECONOMIC IMPACT STUDY
PREPARED BY: THOMAS MARTIN

V-18

f

NON-EXCLUSIVE TOUR & LICENSED BATTLEFIELD
GUIDE TOUR CENTER : REVENUE $100,000.00
[RENT FOR 4,600 SQ FT]

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NO BASIS FOR THIS NUMBER. JUST "PLUGGED IN" AS JONATHAN LANE [OF ICON] STATED AT NPS PUBLIC WORKSHOP.

## RESPONSES

f The estimate for revenue from the proposed tour center was provided by Kinsley Equities, not by The Office of Thomas Martin.

10.

*C.M. Uberman Enterprises*

by FAX

September 25, 1998

4 Pages

Christine O'Connor
Office of Congressman Bill Goodling
2263 Rayburn House Office Building
Washington, D.C. 20515

Re: Gettysburg National Military Park

Dear Ms. O'Connor,

We would again like to express our appreciation for the time the Congressman spent with the citizens and business community of Gettysburg, last Saturday.

It appears that the citizens who spoke did not make it clear to the Congressman, after two hours, that there is much confusion and disinformation concerning the General Management Plan for the Park. The Congressman had asked that we supply you with a written list of the "confusion" that was presented to him.

"IF YOU CAN'T CONVINCE THE PEOPLE, CONFUSE THEM" - H.S. Truman

THE GENERAL MANAGEMENT PLAN , GETTYSBURG
KINSLEY/NATIONAL PARK SERVICE

1. Superintendent Latschar self imposed a 60-day public review period. Mr. Latschar states that this is being done because of lack of funding. What Superintendent Latschar does not say is: is he speaking of calender year 1998 or fiscal year september 30, 1998? - in either case why are National Park Service documents being ignored that state the due date for the Gettysburg GMP to be June, 1999? [Documents can be supplied]

2. How much will the project cost, 40 mil, 63.5 mil or 74.79 mil? All these numbers have been given by NPS. Where will these millions of dollars come from?

3. If the developer, Kinsley [and his Foundation] does not raise 30 million for the Gettysburg project, we are told by Superintendent Latschar that Kinsley and the National Park Service can renegotiate. Renegotiate what? Renegotiate without Congressional oversight or public review! The fox is not just in the hen house but is in partnership with the rooster.





United States Department of the Interior
NATIONAL PARK SERVICE

GETTYSBURG NATIONAL MILITARY PARK
GETTYSBURG, PENNSYLVANIA 17325

EISENHOWER NATIONAL HISTORIC SITE
GETTYSBURG, PENNSYLVANIA 17325

IN REPLY REFER TO

A36
X-D18

October 19, 1998

Honorable William F. Goodling
Member of Congress
2263 Rayburn House Office Building
Washington, D.C. 20515-3819

Dear Congressman Goodling:

Thank you for your letter of September 28, forwarding 20 questions from Mr. Saul Eric Uberman, owner of the National Civil War Wax Museum in Gettysburg, Pennsylvania. We are pleased to provide our responses to Mr. Uberman's questions and concerns. For ease of understanding, we will respond in the order of his questions.

The 60-day public review period for the draft General Management Plan/Environmental Impact Statement (GMP) is considered by the National Park Service (NPS) to be a sufficient period of time for interested members of the public to review and comment upon the GMP. It is a longer public review period than is required by regulation and policy. In addition, the overall amount of public review opportunities provided by the NPS for this plan is almost unprecedented. There have been over two dozen public meetings conducted by the NPS over the last several years, where specific aspects of the GMP were outlined, discussed, and reviewed with the public. In short, the NPS is convinced that the public has been given more than ample opportunity to review and comment upon the GMP.

The cost estimates for the different alternatives considered in the GMP may be found in Appendix 4 of the draft plan (pp. 312-322). In particular, the cost estimates for Alternative C (the preferred alternative) show annual operations and maintenance costs of an additional $1,434,608 per year, and total costs of plan implementation of $74,789,996. Of the total implementation costs, $63,559,996 are capital costs, and the remainder is planning and design costs. $49,285,00 of the total implementation costs are expected to come from partnerships.

# COMMENTS

Page Two
September 25, 1998

4. The Transportation Analysis for the GMP, as prepared by Orth-Rodgers & Associates was based on a "shuttle plan". Does the "Shuttle plan" exist within the GMP? There is no documentation of the "shuttle" within the GMP or the Kinsley Proposal.

5. The Economic Impact Evaluation for the GMP, as prepared by The Office of Thomas J. Martin, was a "made as directed" analysis for the client - The National Park Service. Mr. Thomas stated at public meetings that, 1) some numbers were simply "plugged in", 2) there was no primary research done for this evaluation, and 3) there was no back-up to his numbers other than what NPS had given him. We state simply that his numbers were grossly undervalued to hide the commercial devastation that this project is intended to do.

6. Within the GMP there is $1,000,000 spread over ten years for technical assistance to partner communities, Gettysburg Historic Pathways, and other historic areas. There is no money and no prospect for money. If the money does come, who portions it out? Who determines which areas are more deserving than others?

7. The simple questions of hours of operation of the Kinsley Visitor Center is in a state of confusion. The GMP and the Economic Impact Evaluation do not agree on hours of operation; in fact Mr. Kinsley and Superintendent Latschar do not agree of the hours of operation. This is crucial if one is to know the economic impact that this facility will have on the community.

8. The Kinsley Visitor Center to be a Federal Building or not? [Documents can be supplied showing that Kinsley is speaking to Townships about this issue]

9. The question of taxes has been raised depending on how the new facility is regarded, Federal or not. The Kinsley project manager states all taxes will be paid, but Mr. Kinsley himself states that only the "appropriate" taxes will be paid. Which is correct?

10. Does the Davis-Bacon Act apply to this project? Federal or private development? If the Act applies how much will the project be increased by?

# RESPONSES

2

As we informed the public in June, the proposed agreement between the NPS and the Gettysburg National Battlefield Museum Foundation (Foundation) will require the Foundation to raise no less than $27,360,000, and to borrow no more than $11,985,000. If the Foundation were successful in raising more than the minimum amount required by the proposed agreement, renegotiation of the agreement would not be required. If, however, the Foundation is not successful in raising the minimum amount, renegotiation with the NPS will be required to determine whether or not we wish to extend the fund-raising period, delete some aspect of the project, or authorize the borrowing of more than the agreed upon amount.

The transportation analysis performed by Orth-Rogers and Associates recommends a shuttle system as one means of alleviating and managing traffic flow throughout the battlefield during peak visitation periods. Outlines of a proposed shuttle system may be seen in the GMP on pages 77, 96, 121, 137, 143, 149, 154, and 163.

There is no basis for the claims that the economic impact analysis performed by the Office of Thomas J. Martin is flawed in any way, as Mr. Uberman alleges. The analysis was performed by a nationally known and well-respected firm, and was performed in accordance with all normal industry standards for such analyses.

The technical assistance funds recommended in the GMP are based upon the provisions of Public Law 101-377, which authorizes the Congress to appropriate funds to encourage conservation of the Gettysburg National Battlefield Historic District by landowners, local governments, organizations and businesses. The text of P.L. 101-377, which will answer Mr. Uberman's questions concerning implementation of technical assistance funds, may be found on pages 309-311 of the GMP. As you know, we are dependent upon the Congress to appropriate funds for this purpose, and we look forward to working with your office to seek these appropriations over the coming years.

Both the GMP and the economic impact analysis are silent on the question of hours of operation for the proposed new visitor center/museum complex. The economic analysis is based upon anticipated annual visitation to the park and estimated market penetration, rather than hours of operation.

The proposed complex will be a NPS visitor center and museum. It will be owned by the Foundation and operated for the benefit of the NPS, as described in the Letter of Intent (GMP, pp. 326-329).

11. The National Park Service States [Superintendent Latschar] that the Cyclorama is not historic and should be torn down. The Pennsylvania Historic Preservation Board says not so fast, it may in fact be historic.

12. Eastern National Park retail facilities have no lease within the GMP. There may not be a lease because they do not know who to make it with - with Kinsley or the National Park? Do concession laws apply or not?

13. Congressman Goodling requested and received 1.7 million for Gettysburg, specifically, for engineering and design for the Kinsley Visitor Center and Museum. Superintendent Latschar has stated the money will be used for "Fantasyland, engineering, inventory of artifacts and condition assessment of Cyclorama. Which is it? Does the Congressman appreciate the money which he earmarked for one thing going to another?

14. The National Park Service states in the newspaper that the roads and sites within the battlefield may be temporarily closed; than on another day state that the roads and sites will always remain open. Which is it?

15. Superintendent Latschar has repeatedly stated that this project will not cost the taxpayers any money. That the NPS is broke. That the NPS will not pay rent to Kinsley (as Mr. Kinsley had originally proposed). To support Superintendent Latschar the Operating Proforma of Revenue Generated does not show any rent from NPS. But, apparently this is not true, because on page 98 of the GMP we see that the Park will in fact pay Kinsley for "building operating services". Rent by any other name is still rent.

16. The Park Service will have an open hearing for public statements and questions "for the record", but the Park Service itself will not respond "on the record". The Park Service will reply "on the record" in writing as an appendix the reviewed GMP. Why bother?

17. Senator Thomas, in February of this year, stated that if the public perceived that the GMP was "predetermined" because of the aspect of the Kinsley project, it would fail. The Senator saw the confusion.





This meets the definition of a government facility within the zoning codes of Cumberland Township.

The definition of the facility for local zoning purposes (as above) has no relationship to taxes. Since the facility will be owned by the Foundation and will be sited on land owned by the Foundation, the Foundation will pay all appropriate taxes as required by law.

As the Director of the NPS informed Congressman George Miller this summer, "Until a final or near final agreement is negotiated by the NPS and the selected proposer, it may not be possible to determine if the terms and conditions of that agreement will require inclusion of Davis-Bacon provisions. The current cost estimates do not include Davis-Bacon provisions." We have not asked the Foundation to produce Davis-Bacon estimates for the revised proposal, so at this time we cannot state for certain what the increase might be.

The Keeper of the National Register of Historic Places has determined that the Cyclorama Building is eligible for listing on the National Register of Historic Places. Consequently, the NPS has entered into consultations with the Pennsylvania Historical and Museum Commission and the Advisory Council on Historic Preservation, in accordance with the implementing regulations of Section 106 of the National Historic Preservation Act.

Eastern National is a cooperating association with the NPS. Both the current, and any future, cooperation association agreement will be with the NPS, and not with the Foundation. Concession laws do not apply to cooperating associations.

The "capability statement" which the NPS provided to the House Subcommittee on Interior Appropriations stated that if Congress chooses to make funds available through the fiscal year 1999 appropriations process, the NPS could use no more than $1.7 million. The statement informed the Subcommittee that such funds would be used for the purposes of off-site engineering and survey work, for conducting a thorough condition assessment and treatment plan for the Cyclorama painting, and for initial interpretive exhibit design work.

The NPS cannot be responsible for whatever may or may not be printed in the newspapers. The actual proposals regarding traffic management on park roads may be seen on pages 76 and 92-95 of the GMP.

"Building operating services" are utilities, custodial services, and minor maintenance services. They are not the same as rent.

## COMMENTS

Page Four
September 25, 1998

18. The "retail" facilities will be the largest in Gettysburg, but the Park Service says that there are no "Retail" facilities if the business is conducted by Eastern National Parks. Retail is retail.

19. The Park Service says there is no sent down restaurant facilities, but within the GMP they state that there will be a 6,000 sq. ft. facility with 300 seats. This will be the largest, if not the largest food facility in Gettysburg.

20. The repugnant "scorched earth policy" of degrading and name calling of those who disagree with the Executive Branch of our Government has now reached Gettysburg. In an opinion piece written by Bobbie Platt, the Vice-Chairperson of the Gettysburg National Military Park Advisory Commission, an appointed position by the Secretary of the Interior, stated that those who wanted an extension of the 60 day review period of the GMP or who disagreed with the GMP were "Geeks" and "D.A.W.G.s" [Don't argue with geeks]. By definition, Congressman Goodling is painted with the same brush (as well as Senator Arlen Specter). We believe that this is outrageous behavior for someone who is appointed to a position to help advise the Park on sensitive issues.

Ms. O'Connor, these are not sentiments by just a few people with bones to pick with the National Park Service, but from a concerned community. It does not serve our Country well to be involved with a developer who will savage the community and battlefield, as he wraps the American Flag, with the help of the Park Service, around himself.

Sincerely,

Eric Uberman

PLEASE COPY THIS INFORMATION TO MS. STRYCHARZ

## RESPONSES

4

During the public review period, the draft General Management Plan/Environmental Impact Statement is the NPS's "on the record" proposal for achieving the park's long-range goals. The purpose of the public review period is to provide the public with the opportunity to comment upon the proposal. We have an obligation to consider all comments received - both from local citizens and from the thousands of interested citizens from around the nation who live too far away to attend local public meetings. Consequently, we cannot respond "on the record" to comments, suggestions or criticisms received from local citizens until we have had the opportunity to carefully review and analyze all comments received from all interested parties. All such comments, along with the NPS responses, will be printed in the final GMP. In addition, the final GMP may be revised in accordance to those comments and suggestions. The final GMP will be the NPS's "on the record" response to all comment received. When the final GMP is printed, copies will be sent to every person who offered comments on the draft GMP, so that all concerned will be able to see all comments received and all responses to those comments.

We have no comment concerning Mr. Umberman's opinion of Senator Thomas' remarks.

Any of the proposed facilities in the new complex, which may be operated by Eastern National, would be operated in accordance with NPS policies governing cooperating associations.

We have not measured the square footage, or the seats, of any of the 27 restaurants or snack shops within 2/5 mile of the current visitor center, so we cannot comment upon Mr. Uberman's statement. However, the GMP clearly states the revised proposal provides for cafeteria-style food service. The sit-down restaurant, which was included in the original proposal, has been deleted.

Finally, we have no comment concerning Mr. Uberman's dissatisfaction with Ms. Platt's opinions, or the way she chooses to express her opinions.

If there are any further questions that we may answer, please let me know.

Sincerely,

Dr. John A. Latschar
Superintendent

GETTYSBURG TIMES

VOL. 96, NO. 211 GETTYSBURG, PA, SEPTEMBER 16, 1990

12.

# 'J Bob' and the D.A.W.G.s

*Editor, Gettysburg Times:*

This letter was sent to me from my aunt "Betsy." It was written by my cousin "J Bob" and I thought maybe some of your readers might like to see it.

*Bobbie Platt*
*Gettysburg*

Dear Uncle Eric:

I've been in Gettysburg quite a while now. It's a nice place and folks from all over come to visit what they call the battlefield. Seems like they had a big argument here between the Rebs and the Yanks about 135 years ago and folks like to see where it happened. Shucks, if they want to see an argument all they have to do is come to one of the meetings held by the park folks. They're the ones that have to take care of the battlefield or, as it's called, the "park." There's always somebody doesn't like what's going on there. I've gone to a bunch of meetings and seems the same folks raise a fuss at every meeting.

Now they're mad 'cause the park folks put out something called a General Management Plan. It's a big thing, about 330 pages, so I'm told, and they want comments on it in 60 days. The folks who like to fuss, maybe I should call them the "Don't Argue With Geeks" bunch, are unhappy. The D.A.W.G.s say they can't read the whole thing in two months. Gosh that's five-and-a-half pages a day so maybe it really is too much for some folks, especially if they don't like the idea in the first place. Some of them want more time, I guess so they can figure out some new reasons to argue. I read somewhere that the last big plan took 13 years to get approved. Wonder if that would satisfy the D.A.W.G.s? Anyway, they claim to talk for the people of Gettysburg, say they have about two dozen members. But I hear there's about 8,000 folks living in the town so maybe there's one or two here and there who don't agree with the D.A.W.G.s.

According to an article in the town paper, the D.A.W.G.s want to raise some money, I suppose to hire some lawyer fella to help them read the plan. Anyways, there's some folks in Washington (D.C. that is) – I hear one's a lobbyist – say they'll contribute some of the money. Since one of the D.A.W.G.s is from Washington himself I guess you could say they have a Washington connection and you know what that means.

Some of them claim the park folks will try to get even with D.A.W.G. members 'cause the park counts "men, women and children." Seems kind of silly to worry about things like that. Gosh if they didn't know how many folks came there how would they know how many bathrooms they need?

One D.A.W.G. says they are having meetings every week and everybody is invited but he didn't say where and my invitation hasn't come yet. Maybe they don't want me 'cause I go out to the park sometimes to help when things get really busy. So I guess I can't go to the D.A.W.G.s but that's OK. I don't want to be a D.A.W.G. anyway. I like cats better.

*Your nephew,*
*"J Bob"*

MS. PLATT IS VICE-CHAIRMAN OF THE GETTYSBURG NATIONAL MILITARY PARK ADVISORY COMMISSION. APPOINTED BY SECRETARY OF THE INTERIOR

## COMMENTS

*C.M. Uberman Enterprises*

October 5, 1998

Superintendent
Gettysburg National Military Park
Gettysburg, Pennsylvania 17325

The agenda of the Park, is just that, the agenda of the Park. Are there concerns for citizens? After Thursday nights arrogant and reprehensible performance by the Park Service, I think not. We as citizens speak and go on the record. The Park Service hides behind silence and unrecorded workshop meetings. Why?

The Park Service asks us to trust them and their judgment, but it is the same Park Service which lost control of Thursday nights meeting because of their lack of judgement, lack of common courtesy and the lack of a sense of decency. This lack of judgement is also the hallmark of the GMP. Poor judgement is perhaps another name for the Park Service at Gettysburg.

a 1. After listening to many concerned citizens take to the floor about protecting the environment, it became clear that the GMP overlooked yet another important alternative or just chose to ignore it. When one looks at the battlefield at Gettysburg to contemplate what happened in 1863, is it the trees, woodlots, and deer which visually impair ones sensitivity to those that gave their lives or is it the visually obtrusive National Tower? Why would we as taxpayers allow our taxes to engage in the removal trees and damage the environment when no alternative is presented to resolving the issue of the Tower? Poor Judgement!

b 2. The Economic Impact Evaluation by Thomas Martin:
Why should we trust of believe this work product when; 1) there was no primary research, 2) all economic information was one sided, given by, the antagonist, the Park Service, 3) there is no factual basis for the pro-forma analysis,4) there is no back-up to any numbers as cited by Thomas Martin, 5) some numbers were just "plugged in" as quoted by Jonathan Lane of Icon 6) and lastly the expert did not even know or understand the hours of operations of the facility he was asked to analyze. But, all citizens who pay taxes to the Borough, all citizens who operate the hundreds of businesses within the infrastructure surrounding the Park, and all those communities who will deal with the Park based on this Evaluation should rest easy, because as Mr. Thomas Martin states to the Park and to us that, "No responsibility is assumed for inaccuracies in reporting by the client...No warranty or representations is made that any of the projected values or results contained in this study will actually be achieved." Why would we accept this document, the EIE, as a basis for the defense of the Kinsley proposal within the General Management Plan? No alternative is given. Poor judgement!

## RESPONSES

### Saul Eric Uberman

a It is already NPS policy to acquire and remove the National Tower, and the President's Budget for Fiscal Year 2000 includes funds to do so. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." However, removal of the National Tower has been added to the final GMP/EIS.

b Necessary baseline information was collected by the consultant and included published sources of information provided by local, regional and national economic development agencies, census data, and other sources. NPS provided copies of visitor surveys and of various annual assessments of the economic impact of the national park on the local economy, prepared by the Gettysburg-Adams County Chamber of Commerce and the Friends of the National Parks at Gettysburg.

Local business people were invited to participate in the 30 public meetings held on the draft GMP and the 15 meetings on the draft DCP/EIS, as were representatives of local municipalities. Appendix 10 demonstrates local business and municipal attendance at the GMP workshops. In addition, local business people were invited to share their views with the project team, and others were interviewed by the economic consultant as a part of the work. Chapter 5 lists the community members who were interviewed by the consultant team as a part of this work. A special meeting was held during the comment period to present and answer questions on the economic assessment that served as the basis for the impact analysis contained in the draft GMP/EIS. In addition, NPS has received and evaluated comments from the Chamber of Commerce, the Borough of Gettysburg, Cumberland Township, representatives of the Steinwehr Avenue and Downtown business community and others. The information received from these meetings, interviews, and comments were incorporated in the assessment process, and form an adequate basis for analysis in addition to other baseline information assembled for the analysis.

c Each action alternative includes a proposed shuttle. For this reason, no analysis of the alternatives without a shuttle was completed.

Page Two
October 3, 1998

c 3. The Transportation analysis:
This analysis was done based on a non-existent "shuttle system" No alternatives were given. When the Park Service was asked "What analysis was done for traffic, given the Kinsley Visitor Center existence but with no "Shuttle Service"? We were told that this alternative was not analyzed. But we were not told why it was not. We now ask the same question. Poor judgement!

d 4. The commercial aspect of the Kinsley Visitor Center was first described by Mr. Kinsley as a "mall". We are now asked to believe that just because the operators of the retail stores and food services, entertainment facilities, and tour related facilities might be a 501(c)3 - that the outrageous economic impact upon the community will be justified. The destruction of the infrastructure by any private corporation be it for profit or not for profit should not be allowed. Should the Park Service allow commercialism to be hidden behind the beard of a non-profit corporation? Poor judgement!

e 4. As a taxpayer, we appreciate that the Park Service provided a solicitor to be present at these meetings, but when Washington, D.C. is a short drive away, and has an overwhelming supply of solicitors at the offices of the National Park Service and the Department of the Interior, why did you bring in a solicitor from Boston, Massachusetts, at our expense? And to make matters worse the solicitors law school training was only used to operate a stop watch. Poor judgement!

f 5. Senator Thomas in February of this year stated " the problems identified at Gettysburg have never made it to the service-wide priority lists." He noted the Park Service appeared to have problems developing timely plans for park maintenance. He expressed reservations about Park Service process and public review of plans for siting a proposed facility. Why has not the Park asked or lobbied for the appropriate money for Gettysburg? Poor judgement!

d The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

e The Office of the Solicitor, of the Department of the Interior, maintains regional offices in several locations throughout the United States. With the exception of the Washington D.C. metropolitan area, all Interior agencies in the northeast region are served by the regional office located in Boston.

f Gettysburg National Military Park requested line-item construction funds in 1985, 1990 and 1993 to correct some of the life safety, accessibility and building deficiency concerns of the current visitor center and Cyclorama buildings. In 1996, the park requested line-item construction funds for the complete rehabilitation of both structures. However, neither request successfully competed against the estimated $5.6 billion maintenance backlog of the NPS on a national basis, and consequently neither request was included in NPS' service-wide construction priority list. Therefore, the President has not formally requested any funds from Congress for rehabilitation of these park buildings, as part of the Administration's budget request.

## COMMENTS

Page Three
October 3, 1998

g 6. The GMP does not address the monopoly of the "Friends" 365 day a year soliciting of funds within the Visitor Center Complex. Currently the "Friends" fundraising is in the amount of between $30,000 to $40,000 per year. 1) Will the "Friends" continue to be the only Civil War fundraising group allowed to collect and receive donations from the public within the new Kinsley Visitor Center? 2) How will this impact the fundraising efforts of the foundation? Poor Judgement has been exercised in the past, will poor judgement be allowed to continue?

h 7. Alternatives B, C, and D all contain the exact same features when it comes to the Kinsley Visitor Center. To be more precise the Kinsley Visitor Center is "predetermined" because there are no other alternatives presented. Why are there no alternatives presented to the Kinsley Plan? It is a take it or leave it attitude. Poor judgement!

We hope the Park Service answers all the above question.

The Park Service presents no alternatives within the General Management Plan in regard to the Kinsley Visitor Center. The General Management Plan in its present form should be stopped and a new General Management Plan started.

Sincerely,

Saul Eric Uberman

## RESPONSES

g NPS may enter into agreements with non-profit associations which can ensure that 100% of the funds collected will go to the NPS. The Friends of the National Parks at Gettysburg (FNPG) return 100% of the donations collected in the Limber Chests to the Park. Since NPS has no reason to believe that this would change in the future, the Friends would likely continue to collect donations in the new museum complex. The NPS does not expect the FNPG donation boxes to have any effect on the Gettysburg National Battlefield Museum Foundations fund raising efforts.

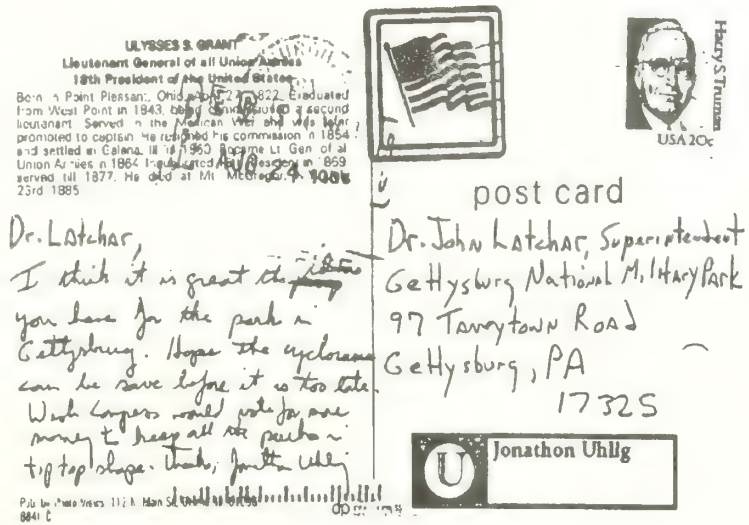
h Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the GMP/EIS. Working with the public, NPS established goals for the draft GMP/EIS (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

| COMMENTS | RESPONSES |
| --- | --- |
| | As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA. |

## COMMENTS




## RESPONSES

**Jonathon Uhlig**

Dear Dr. Latschar,

I sincerely hope that you realize the park is not yours to use for a personal agenda. You are a short term caretaker & I hope you remember the men who lost their lives on this sacred ground & consider what they would have wanted the park to be. I pray that this is not just another swindle like the Railroad Cut.

Sincerely,

Name Michael Vallone

Address

Michael Vallona

## COMMENTS

Author: at NP--INTERNET
Date: 10/4/98 7:12 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: e-mail
---------- Message Contents

Dear Superintendent Latscher:

Having read all the newsletters and finally the massive Draft General Mgt Plan received in August, I now want you to know my vote:

PLAN B I vote for this as the best combination of cost and restoration.

Thank you very much.

Sincerely,

Dr. E. Reginald Van Driest II

## RESPONSES

### E. Reginald Van Driest II

## Douglas J. Veverka

September 30, 1998

To whom it may concern,

I'm writing in regards to the General Management Plan involving Gettysburg National Military Park. I am a frequent visitor to the battlefield, and also an avid follower of the events that took place during the Civil War. I first took interest in the Battle of Gettysburg when I was twelve years old. I'm now nineteen, and my interest and knowledge has greatly increased over the last seven years. The field itself has also been very important to me because of its tranquility, peacefulness, and overall emotional history. I've spent several hours just sitting and thinking upon Little Round Top, overlooking the valleys, fields, and woods encompassing the countryside. Those times have helped me decide what I want to do, and where I want to go with my life. This battlefield has a powerful impact on not only myself, but thousands of people all over the country and the world.

I personally agree with the construction of the new visitor's center as long as the areas of the old visitor's center are rehabilitated to its original form in 1863. That area of the field did play a major role in the three day battle, and should be able to be viewed as the soldiers viewed it 135 years ago. No monuments are necessary, but the landscape is essential to the historical significance that took place on that hallowed ground. Also, the timbering and rehabilitation of other such areas in, and around the battlefield is key in helping to understand what the brave men in blue and

| COMMENTS | RESPONSES |
| --- | --- |



gray truly were faced with upon those hot days in July. However, as I've heard, this must be an extended project, whereas it should take 10 to 15 years to complete. I suggest it be done in a step by step process, during off seasons, in order not to cause the battlefield to look like a construction zone. In addition, I feel the natural resources need to be filtered back into the park, such as fence posts and building material.

I look forward to the improvement in Gettysburg, and trust the town and National Park Service will have great success. I sincerely hope the changes have a positive outcome for tourists, without taking away from the natural wonder of the land. I would appreciate as much information as possible, and offer my help in whatever ways might be needed. Please keep in contact. Thank you.

Sincerely,

Douglas J. Veverka

## Tom Vossler

14 October, 1998

Dr. John Latschar
Superintendent, Gettysburg National Military Park
Gettysburg, PA 17325

Dr. Latschar:

I am one of the media stifled majority in favor of the planning which you and your staff have done on the Draft General Management Plan and proposed new Visitors Center. I have spoken favorably at numerous public meetings and hearings regarding the Draft GMP, most recently at the 3 October public hearing. I have enclosed my verbatim comments at that hearing.

In that we were limited by time at the 3 October hearing, I wish at this time to amplify on my comments made at the time.

It is my view that throughout the months of debate on the GMP in general and the proposed Vistior's Center specifically, the dominant opposition to your plans have been the local business community. While I fully support a democratic free enterprise system and the right local business men and women have to conduct business when and where they can, I have little sympathy for those who have attempted to undermine the successful promulgation of a GMP and new Visitor's Center based on their profit motive.

Indeed, there are greater issues at stake here, specifically a modern, technologically advanced, state of the art, and hopefully interactive, Visitor's Center experience which can adequately portray to the American public one of the watershed eras of American history.

That the era of the American Civil War was a watershed era in American history cannot be denied. Although battle history receives most of the attention regarding this era, other aspects deserve attention: the industrialization of the country necessary in providing war material; the advancement of the roles and rights of women throughout the era; the advancement of Negro rights (specifically the thirteenth, fourteenth and fifteenth amendments to the Constitution which resulted from the war); and the rendering and then healing of the country on a regional basis which resulted in a stronger, more vibrant, and more democratic union of states - a union which will now carry us to the beginning of a promising new century of freedom and democratic principles.

## COMMENTS

Again, in my view, the current Visitor's Center can not, and a refurbishment of that facility would not, adequately present to the American people (and numerous foreign visitors) the complete social-economic-military history of the era as it ought to be told. Hence, I am totally supportive of your plans for the new Visitor's Center.

Regarding the remainder of the GMP and plans to restore the battlefield, you have my support there as well. As a former professional soldier and trained military historian, the battle history is understood by me, it has been part of my culture for over thirty years. However, I have spent considerable time (hundreds of hours) on the battlefield with American and International citizens and can tell you first hand that without adequate interpretation, the battle would be incomprehensible to them. The strategy of the generals and the gallantry and sacrifice of the soldiers would be lost to the average visitor in the absence of restored physical aspects of the field, availability of appropriate visual displays, and the services of Licensed Battlefield Guides and NPS historians.

a In contrast to the foregoing, I do have some concerns about the draft GMP as currently proposed. The Traffic Management System is too ill-defined and I believe the overall transportation and traffic component internal and external to the battlefield needs further analysis and work.

b I also would like to see a stronger, more positive, role for the corps of licensed battlefield guides to assist in interpretation. However, I trust these issues will be adequately addressed as you and your staff work to refine the planning document.

Lastly, to this point in the "great debate" few of the "experts" have thought to think of, or speak of, the heritage left on the field by the combatants. While I cannot speak for the soldiers who fought here, I do feel qualified to represent them. Being a kindred spirit with them, I believe they would want to see their battlefield restored and represented to their ancestors as you have outlined in your draft GMP.

Tom Vossler

Tom Vossler

## RESPONSES

a The specific details of the proposed traffic management system have not yet been designed. The detailed implementation study necessary to further define the proposed system would be completed after NPS selects an alternative. NPS agrees that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. PennDOT is now in the process of advertising for an engineering firm to provide these comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widening, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

b Licensed battlefield guides are an important element of the interpretation at GNMP, and NPS intends to maintain, strengthen and expand their role in providing these services to visitors. The preferred alternative would enhance the park's interpretive programs. The new museum complex would be the starting point for many visitors, who would then use the resources of the park as the primary learning tool. The plan emphasizes that new interpretive programs expressing the park's interpretive themes would be presented by rangers and licensed battlefield guides. NPS would prepare a new interpretive plan that would expand upon the goals and themes outlined in the draft and final GMP/EIS. NPS looks forward to working with the Association of Licensed Battlefield Guides in developing this plan.

Dear Dr. Latschar,

I am interested in having the general management plan move ahead. Please get the new museum completed at Gettysburg

Sincerely,

Name Edith Wacksman

Address

**Edith Wacksman**

## COMMENTS

Dear Dr. Latschar,

ils Very Important that the General MANASEMENT PLAN move FORWARD. We Appreciate the opportunity To be Heard!

Sincerely,

Name Bruce Walker

Address

## RESPONSES

**Bruce Walker**

Dear Dr. Latschar,

Its important the General Management Plan move forward in Gettysburg

Pls help these plans move ahead

Sincerely,

Name Philip J. Ward

Address

Philip J. Ward

## COMMENTS

August 23, 1998

DR. JOHN LATSCHAR, SUPERINTENDENT
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

This letter is written to commend you for supporting 'Friends of 'The National Park at Gettysburg. I believe and want negotiations to move forward in a positive and productive direction.

Thank you for your support.

Sincerely,

JAMES R. WARNKE

## RESPONSES

**James R. Warnke**

10/10/98

**Dear Dr. Latschar,**

PRESERVATION OF THE HERITAGE OF OUR NATION, THE HERITAGE OF VALOR + SACRIFICE THAT IS GETTYSBURG, IS NOW IN YOUR HANDS. IT IS INCUMBENT THAT THE GENERAL MGMT. PLAN FOR THE NAT'L PARK MUST BE MADE A REALITY! THANK YOU!

Sincerely,

Name JEFF WASEL

Address

**Jeff Wasel**

## COMMENTS

7/7/10

Dear Dr. Latschar,

I am writing to you to ask you to help move the general Management Program for the Gettysburg Nat'l Park forward. The Battle field & it's historical artifacts must be preserved & better cared for.

Sincerely,

Name Mary E. Watson

Address

## RESPONSES

**Mary E. Watson**

August 20 1998

Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

I am pleased to support the Visitor Center/Museum Complex at Gettysburg National Military Park.

In the past, I have had many reservations about this project because of the retail aspect of the plan. Gift shops and Civil War Arts and Crafts stores are not appropriate at Gettysburg. It is not the responsibility or purpose of GNMP to amuse visitors. Their education is the primary purpose of GNMP. Therefore, I am happy to see these parts of the plan eliminated.

Similarly, the IMAX theater is not necessary for educational purposes, so I am glad to see that go. One more piece remains; the restaurant. People have to eat, I know; however, there are plenty of restaurants in the town itself. Again, feeding visitors is not a priority as far as I am concerned. The restaurnat must be eliminated; I am hard line on that.

This entire project must be kept non-profit. It is not for us to profit from the deaths of fellow Americans, North or South.

Thank you for your time.

Phyllis Marshall Watson

## Phyllis Marshall Watson

## COMMENTS

Dear Dr. Latschar,

For all of us here, we appreciate the opportunity to be heard. I feel that future generations will be glad that we were heard. So please see if you can help General Management go forward on the Complex Museum

Thank you

Sincerely,

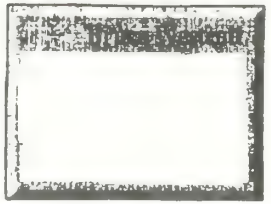
Name Portia L. Webster

Address

## RESPONSES

**Portia L. Webster**

## Bruce Westcott



September 10, 1998

The Honorable James M. Jeffords
Senate Office Building
United States Senate
Washington, DC 20510

Dear Senator Jeffords,

I am well aware of your long-term interest and action in support of preservation of Civil War battlefields, and am so writing you about current plans for Gettysburg. Unlike Howard Coffin, my great-grandfather was from Rhode Island, but I feel as much kindred spirit to the Old Brigade as does Howard. I am a member of the Friends of the National Parks at Gettysburg, and have followed for several years the evolving plans for the new Visitors' Center, and the public-private partnership envisioned.

I would like you to know two of my opinions. First, I think the Congress of the United States is derelict in its duty by not providing the level of public funding sufficient to allow its stewards to responsibly manage this national treasure of land, buildings, artifacts and history. The amounts that would be required of the public treasury in order to take reasonable care of our heritage are so measly as to cast the shadow of pettiness and carelessness over the Congress' continued failure to meet its responsibility to us all. Having said that, I should add that I hold your colleagues more responsible than I do you, knowing of your support for preservation. And I thank you for it.

Second, I have followed recent developments regarding the proposed Center, and the Draft General Management Plan. I want to express my support for the process that has been outlined, the progress that has been made, and continued action toward completing this planning process and moving into action. I strongly support the efforts of all the parties to arrive at a reasonable outcome that will benefit us all.

Thank you for your consideration, and please support these efforts.

Sincerely,

Bruce Westcott

cc: Dr. John Latschar, Superintendent - GNMP
Ms. Vickey Moreau, Executive Director - FNPG

*Information Management Strategies*
*Spatial Data Project Management*
*Organizational Development & Facilitation*

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>It's important that the General Mgt. Plan move forward, please voice my support and others from FNPG.<br>Sincerely,<br>Joseph F. Wilburn | **Joseph F. Wilburn** |

Author: at NP--INTERNET
Date: 10/15/98 12:56 AM
Priority: Normal
TO: GETT Superintendent at NP-GETT
CC: sseay@npca.org at NP--INTERNET
Subject: enhancement plan for Gettysburg NMP
---------- Message Contents

Dr. John Latschar, Superintendent
Gettysburg National Military Park

It sounds like the NPS has come up with a good plan for the future of the Gettysburg NMP. Based on a description of the plan that I have received from NPCA, I would concur with their recommendation that the Preferred Alternative should be accepted.

Thank you for your consideration of this matter.

Sincerely,
David A. Wilcox, Jr.

## David A. Wilcox, Jr.

## COMMENTS

Oct 9, 1998

Dear Congressman Gooding,

I am writing you concerning the Gettysburg National Park. There are several things I am concerned about. Mr. Latcher said that a 300 seat cafeteria is not a restaurant – let's get real. it is still a place to eat and has no place in the new visitor center complex. It will only hurt the restaurants in the town. The government should not be in the food business. No matter how Mr. Latcher tries to get his own way.

a

Mr. Latcher said the deer were destroying the tree's in the park so they killed more than 850. Now they want to cut down 500 to 800 acres of woodland. What gives here? What happens to the birds and other wild life in the park?

b

We do not need to make things look like 1863 to understand what happened. We have maps, models and verbal descriptions and no trees need to be lost.

c

Do we do away with the paved roads and monuments. I'm sure they were not.

## RESPONSES

### Mrs. William D. Wilkinson

a NPS evaluated the impact of the cafeteria-style restaurant in the proposed park museum facility on the local tourist economy. The analysis found that even with the inclusion of food service in the park visitor center, there would be positive impacts on local food businesses. The analysis found that excluding expenditures in the food service facility, there would still be an increase in visitor expenditures for food purchases made outside of the park. The findings are described in Table 41, found on page 274 of the draft GMP/EIS.

However, NPS considers that a limited food service facility with a lower level of service would meet NPS' needs. Accordingly, the proposal has been changed to indicate that the food service facility will offer a limited menu without significant on-site preparation of food. The menu might include a limited offering of salads, soups, baked goods, light sandwiches, fruit, snacks, desserts, soft drinks and coffee. In addition, period foods from the Civil War era might be offered. Visitors are expected to use the limited food service facility for light meals, between-meal snacks and drinks. This limited food service would allow visitors to extend their stay and properly use and enjoy the facilities. Analysis of a food service facility providing a lower level of service indicates that food service expenditures within the park would decrease 34% from the impact predicted in the draft GMP/EIS, and that visitor expenditures outside of the park would therefore increase by an estimated additional $495,000 to a total of $24,278,900 annually, an increase in visitor spending within the community over that described in the draft GMP/EIS.

b The objective of the white tailed deer management plan is to protect the historic battle landscape from the adverse affects of over browsing by deer. One of the goals of the action alternatives in the draft GMP/EIS was to rehabilitate the historic battle landscape of the park. The removal of non-historic vegetation or the addition of historic fencing throughout the agricultural areas of the park would not affect this goal. The historic woodlots and crop fields identified in the Final White-tailed Deer Management Plan/EIS and draft GMP/EIS would remain as part of the historic battle landscape.

c NPS visitor surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and

this is 1863. Silly isn't it? Lets use common sense.

The last thing is the Rosensteel family. They gave the house and civil war relics to the government to take care of for all of us. Now Mr. Latschar the government can not take care of them and he wants to give the relics to a $39 million center designed as a part of a public/private partnership with York developer Robert Kinsley. The park has violated the family's original donation agreement with the park service as their attorney has said. There are more than 38,000 civil War artifacts.

d

I hope the family get them back as Mr. Kinsley does not deserve to make money from something that belongs to the people.

e

The last thing I think Mr. Latschar should be removed from the Gettysburg National Park. He has reached the point where he thinks he is God and what he says goes.

Hope you will answer each question.

Sincerely,

Mrs. William D. Hutchison





help the park meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the draft GMP/EIS, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive rangers are frequently asked if the battlefield landscape looks as it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible. That is why each of the action alternatives suggests some level of vegetation removal.

d Although the museum collections were donated to the Government, the Rosensteel business and building improvements were purchased for $2.3 million. As noted in the Letter of Intent, printed in the draft GMP/EIS on pages 326-329, the ownership of the museum collections would remain the property of the United States.

e To the question regarding any potential sources of gain to the Kinsley Construction, Inc., Robert Kinsley or the Kinsley family, Mr. Kinsley has provided this response. "My proposal was to create a non-profit 501 (c) (3) foundation, the Gettysburg National Battlefield Museum Foundation, which would be the "developer" of the project. This would enable contributions to be made to the Foundation that would be tax-deductible by the donor. The Foundation would have a national board of directors comprised of representatives from the business, financial, educational, and historical communities. I hope to serve on the board of directors. The board of directors would be formed after the General Management Planning process is completed and the definitive agreement between the Park Service and the Foundation is finalized. The operation of the visitor center and museum will not result in any economic benefit to me, as all net proceeds realized by the Foundation from operations will inure to the benefit of the NPS. I will also have no financial interest in any of the entities operating within the visitor center, such as the tour companies, the film theater, the food service or any book or museum store.

"I am Chairman and Chief Executive Officer of Kinsley Construction, Inc., a regional construction contracting company that I started over thirty-five years

ago. Kinsley Construction has averaged annual construction volume of $150 million over the past several years. We hope that the Foundation's board of directors will select Kinsley Construction to manage the construction of the visitor center project, however that decision ultimately will be made by the board of directors after it is formed. As construction manager, Kinsley construction would manage competitive bidding of all contracts for construction. The construction cost of the project is approximately $22 million. If the board of directors decides that it is in the best interest of the Foundation and its purposes to select Kinsley Construction to be the construction manager for the project, we envision that Kinsley Construction would be paid a construction management fee competitively priced with fees typically charged on similar construction management projects.

"To date, Kinsley Equities, a Kinsley family partnership, has provided all the seed money for this project, without any guarantee that any of it will be returned. You should also know that the Kinsley Family Foundation has donated a grant in the amount of $2 million to the Gettysburg National Battlefield Museum Foundation in order to complete the purchase of the site for the proposed museum and visitor center. To date, prior to signing an agreement with Park Service, Kinsley Equities and the Kinsley Family Foundation have provided the Gettysburg National Battlefield Museum Foundation approximately $3.5 million, to acquire the Levan site and the RV site and to fund all the studies that have been required, including wetlands, endangered species, archeological and traffic studies. That amount also includes site planning performed to date by LSC Design, Inc., an architectural and engineering company primarily owned by the Kinsley family. All other start-up expenses, including costs involved in the public relations efforts and the cost of Kinsley Construction personnel devoted to the planning of the project prior to the agreement with the NPS, have been borne by Kinsley Construction and will not be reimbursed.

"After the fundraising is completed, including the establishment of a mechanism to ensure creation of an endowment for ongoing funding needs, the construction of the museum and visitor center project is complete, and operations commence successfully, it is likely that I will have considered my mission accomplished and would step aside for others to continue this good work. I will have no financial interest other than what has been explained in this letter."

## W. David Williams

October 20, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Rd.
Gerrysburg, PA 17325

I have just read about the exciting plans for renewing and upgrading the Gettysburg National Military Park! Although the article recommended getting letter of comment in to you by Oct. 17, I am still going to write and recommend that such plans proceed! It all sounds great and I do hope that all of the plan can be carried out in due course!

Sincerely yours,

W. David Williams

| COMMENTS | RESPONSES |
| --- | --- |
| [redacted] | **Donald C. Williams** |

October 16, 1998

Dr. John Latschar, Superintendent
Gettysburg National Military Park
Gettysburg, PA

Dear Dr. Latschar,

I'm a member of the National Parks and Conservation Assn. and am excited & very supportive of the far-reaching plan for the major up-grading of your park.

When completed what a monument to this site and Civil War history!

It was 44 years ago this summer past that as a much younger man in my late 20's I made my one and only visit to Gettysburg.

As described by the NPCA the finished park will be even better than a similar one just south of Brussels Belguim -- Waterloo. The similar interpretive themes, dioramas, paintings, drawings, charts will boldly tell the Gettysburg story as the Napoleon/Wellington story is told there.

If money becomes a problem, the movie can be shelved & added later.

Money . . . I'm sure the American public will help, if asked. I wish the project well

Sincerely, Don Williams

## Roger Willmann

August 25, 1998

To: Superintendent Dr. John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg PA 17325

From: Roger Willmann

Dear Dr. Latschar;

First I would like to thank you for sending me a copy of the Draft General Management Plan and Environmental Impact Statement for the park. I found much information contained in that report that I hadn't seen elsewhere. My wife and I wish we could be there to attend one of your informational workshops, but I'm afraid scheduling and distance makes that impossible, so I wanted to respond by sending our feelings on your proposed plan.

My wife and I are very avid Civil War "buffs". We have fallen in love with the Gettysburg area and some day hope to make it our home. Therefor, we have a deep interest in the preservation of the park for generations to come. Through our membership in Friends of the National Parks at Gettysburg, your mailings, and visits to the area, we have tried to keep abreast of the proposals and ensuing controversies surrounding this new plan. I welcomed the opportunity to look over the details of your four proposed park plans.

Since we do have an interest in the long-term preservation of the park, I must agree with your premise that Alternative 1 is unacceptable. To continue with the current practices will only allow the park's resources to continue to deteriorate. We also agree with the premise put fourth in Alternatives 2-4 that a new Visitor Center / Museum is needed. As I stated in a previous letter to you, I wish that this complex could be built with some of our tax dollars that are wasted on frivolous government programs, but that does not fit into our present day reality. If this project is to be done, it will most certainly require public/private cooperation. I was glad to see that the commercial aspect of the complex has been scaled back, (but I must admit that an I-MAX Civil War presentation would have been "awesome"). As to the remaining portions of Alternatives 2-4, as a preservationist, I would like to see you be able to implement Alternative 4, but that is not practical. I have to agree with the park's assertion that the best balance between preservation of the park and its neighbors is Alternative 3. The fact that this would return much of the park to its 1863 sight lines and appearance, while still maintaining visitor accessibility, seems a good compromise.

I understand that there is some local opposition to the new Visitors Center

| COMMENTS | RESPONSES |
| --- | --- |
| complex. While I can only base my feelings on limited information, it seems as though much of this is coming from local merchants who may be afraid of losing the NPS parking lot. I'm sorry for them, but I would much rather see the restoration of Zeigler's Grove.<br><br>In short, the time to act is now. If we are to save our heritage for future generations, we must begin to move forward. Hopefully this will be such a success that it will become a blueprint for action for National Parks all across the country. I thank everyone whose work made this possible.<br><br>Sincerely<br><br>Roger Wellman | |

## Frank and Rebecca L. Wilson

21 October 1998

MEMORANDUM FOR Dr. John Latschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

FROM: Frank and Rebecca Wilson

SUBJECT: Call To Action For National Parks

1. Please ban jet skis wherever they damage resources or disturb visitors. Tell the park service that a complete analysis must be done in all cases where jet ski use is being contemplated

2. Please support the preferred alternative for preservation of Gettysburg National Military Park.

3. Please preserve park solitude. Please adopt alternative 3a. A control tower would further protect the natural sounds of Grand Teton National Park

4. Please support the citizens' plan to save Yellowstone Buffalo

Thank you,

Rebecca L. Wilson

Frank and Rebecca Wilson

## COMMENTS

Jim Wilson

Dear Supt. Latschar,

I read the recent Post-Gazette article about the debate over the future plans for the park and I'd like to express my support for your position. The concerns of the town merchants are understandable but, as I believe you said, the new plan should "raise everyone's boat". I traveled to the park in October of 1997 with a coworker and I was saddened to see how all those wonderful artifacts are displayed and to know they are decaying. The thought occurred to me: How can Americans spend countless millions of dollars all around the world, often to no discernible good end, and allow this national disgrace to continue?. I've made numerous pilgrimages to the battlefield since my parents began taking us there in the early sixties. It has always been a very special place to me and my brothers. My perception of the battle has progressed from a child's imagining of excitement and glory

## RESPONSES

**Jim Wilson**

to a melancholy perspective of unbearable suffering, tragic loss, and Christ-like self-sacrifice. Gettysburg will fascinate me the rest of my days and I hope that my son will find it the same.

Four or five years ago, one of my friends and a coworker at the Allegheny County Police Department, wondered out loud "Why isn't there a statue for Joshua Chamberlain? I had wondered that myself but figured that surely many others had thought of it and perhaps the General hadn't wanted it. My friend Mike had suggested we inquire into starting a movement to seek approval and funding to erect a monument on Little Round Top. I had meant to write to you about it but eventually forgot about it. Has this been discussed? It seems to me that there would be tremendous support for the project but, again, I have a strong feeling that there must be a good reason not to erect a statue or else it surely would have been done.

Incidentally, my 16 month-old son was christened "Grant Chamberlain Wilson". I think he favors the statue!

Regards,
Jim Wilson

## COMMENTS

20 Oct 98

Dr. John Lathschar, Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Lathschar,

Dropping the planned movie theater from planned changes to Gettysburg NMP will eliminate the need for commercial loans and reduce financial risks because the price of the project will drop by 25%. Interest in the park is so great that it is likely that upon hearing of this void a theater will be donated sooner than if the theater is installed with borrowed funds and then benefactors for these funds are sought out. Thanks for considering my point of view.

Sincerely

Chris Wolk

CHRIS WOLK

## RESPONSES

**Christopher Wolk**

October 17, 1998

John Latschar
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Dr. Latschar,

As a concerned citizen and volunteer for Gettysburg National Military Park,I am writing to give you my support of the proposed General Management Plan, option C. I feel many changes need to be made to the current condition of the battlefield to create a more accurate picture of what happened here in 1863. In fact, I feel I cannot fully appreciate the significance of "key" areas of the battlefield as they are portrayed today.

I have received many calls at my home from concerned citizens pertaining to the removal of trees on the battlefield and how can that be done as it will destroy nature. My response to those people is that, "Yes, many trees will be removed. However, many trees will be planted in efforts to restore orchards that were present in 1863. Secondly, a key point to remember is that even though this a National Park, it is a National Military Park not a Natural Park like Yellowstone. Nature is important, but one goal of this park is to provide the visitor with an accurate account of what happened and to do this the park needs to look as close to 1863 as possible."

a One concern I do have is the continuation of the horse trails on the battlefield. In certain areas there is considerable erosion and large ruts caused by the extensive use of the trails.

I support the proposal of a new visitor center complex as well. To be able to restore Cemetery Hill to its 1863 appearance is something I would like to see. The main reason I support the new facility however, is that something needs to be done to better protect the priceless artifacts on display and in storage in the current visitor center and cyclorama. The deteriorating condition of the artifacts in my lifetime is apparent, and if it continues, how are we able to fully give the visitor an accurate portrayal of life and the war in the 1860's?

Sincerely,

Lisa Wood

Lisa Wood





## Lisa Wood

a Park managers recognize that in certain areas there is considerable erosion and large ruts in horse trails. For that reason the draft GMP/EIS alternatives would relocate horse trails to eliminate the current problems of erosion and rutting on the trails.

## COMMENTS

**Bryan Wyberg**

October 13, 1998

Superintendent
Gettysburg National Military Park
97 Taneytown Road
Gettysburg, PA 17325

Dear Sir:

I am writing concerning the draft General Management Plan and Environmental Impact Statement for Gettysburg National Military Park. I have reviewed the draft copy which I received. I applaud the new research done as a part of this process. I support the draft Alternative D. I believe that Alternative D best preserves the resources of the Park and helps to fulfill the park's role as an interpreter of the battlefield for the enjoyment and education of the visitor.

I am in full support of the rehabilitation of the period landscape elements which affected the outcome of the battle. I am in favor of the resoration of Ziegler's Grove and support moving park facitlities away from the Battle Action Resource Area. The resources of the National Cemetary and the Commemorative Resource Area need and deserve restoration and rehabilitation. A new visitor's center and museum facility is badly needed. I only caution that any commercialization of the battlefield be avoided. We need to maintain a peaceful, beautiful and educational environment within the park.

Again, I am in support of Alternative D of the draft EIS for Gettysburg Park. I have visited the Park in the past, and I look forward to visiting again in the future after these improvements have been made.

Thank-you,

Bryan L. Wyberg

*Bryan Wyberg*

## RESPONSES

**Bryan L. Wyberg**

October 12, 1988

Ms. Marie Rust
Regional Director
National Park Service
200 Chestnut Street
Philadelphia, PA 19106

Dear Ms. Rust:

a For months I have been reading media accounts of the Park Service plan to demolish a historical landmark in Gettysburg, Pennsylvania. The National Museum, as a member of the Rosensteel family I feel I must voice my concern and plead you reconsider the demolishing of this historical landmark.

If the Park Service feels it is imperative that a new visitor center is needed, so be it. Please do not demolish the existing National Museum. For over seventy-five years presidents, dignitaries, Civil War Veterans and millions of Americans have visited and cherished this historical landmark. I always thought the U.S. Park Service was created to preserve our national heritages not tear them down.

It saddens me that you would even consider disturbing any more of the hallowed and consecrated grounds of the Gettysburg Battlefield for a new commercial enterprise.

I sincerely trust you give serious consideration to the concerned citizens of Gettysburg as they try to preserve their priceless heritage.

Sincerely,

Violet Rosensteel Yount

Violet Rosensteel Yount

## Violet Rosensteel Yount

a NPS has proposed removal of the Rosensteel building because of its inability to adequately meet museum collection and visitor demands and because of its intrusion on the site of significant battle action and terrain. NPS proposes relocating visitor facilities to a site that would not harm or infringe upon significant park resources, such as the current Visitor Center (Rosensteel building) does. The building is not included in the park's List of Classified Structures, and is not considered eligible for listing on the National Register of Historic Places.

## COMMENTS

Author: "Dave Zachau"
Date: 8/23/98 9:36 PM
Priority: Normal
TO: GETT Superintendent at NP-GETT
Subject: GMP for Gettysburg National Military Park
---------- Message Contents ----------

Superintendent Latschar:

Firstly, I would like to thank you for a copy of the GMP. I have begun reading this lengthy document and appreciate the efforts and cost that went into making it available to Friends of the Park, such as myself. Not having gone through it in detail yet, I had a question: Is the Eisenhower Tower an issue that any of the alternative proposals will address? At first glance, I did not see mention of the Tower in the Plan. If memory serves me correct, the Tower is owned by a private company, which may leave it's future outside of the National Park Service's jurisdiction. In any event, despite having taken some impressive photos from the tower, I would like to see it razed as part of any Plan to restore the Park. a

All efforts to restore the landscape and vista back to as close to the 1863 topography as possible, along with making preservation of artifacts and the Cyclorama painting a priority will have my vote. Well, back to reading the GMP!

Thanks again for sending this impressive report.

David Zachau

## RESPONSES

### David Zachau

a It is already NPS policy to acquire and remove the National Tower. For that reason, although the removal of the Tower is noted in Chapter 2, section 2.9.1, Figure 21 of the draft GMP/EIS, it is not specifically discussed. It is addressed in the park's 1993 Land Protection Plan (LPP). In the LPP, the National Tower property (identified as Tract 04-203) is designated a high priority acquisition and the objective for this land is to "Remove modern development... and restore site." The draft GMP/EIS has been revised to note this acquisition priority.

Dear Dr. Latschar,

As a Friend of the National Parks at Gettysburg, I appreciate your efforts thus far in the effort for a new museum/visitor center, and hope you will continue pushing the plan forward.

Sincerely,

Name John L Zaremba

Address

John L. Zaremba

| COMMENTS | RESPONSES |
| --- | --- |
| Dear Dr. Latschar,<br>Let us move forward with the General Management Plan for Gettysburg now. Don't let government stagnate. As a FNPG 1st Corps member I thank you for our attention.<br>Sincerely,<br>Name John C. Zimmer<br>Address | John C. Zimmer |

Superintendent Latschar,

As a member of the Friends of the National Parks at Gettysburg, I am writing to you to express my whole-hearted support for Option C of the General Plan. The return of the landscape to 1863 appearance will greatly enhance both the first time visitors understanding of events as well as that of an old "Warhorse" like myself. Also, a belated "thank you" for the tour of your house during the 1997 March for Gettysburg. You get to live where most of us can only visit and dream.

John C. Zimmer

**John C. Zimmer**

## Public Hearing - October 1, 1998

1

* * *

DRAFT GENERAL MANAGEMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT

GETTYSBURG NATIONAL MILITARY PARK

GETTYSBURG, PENNSYLVANIA

* * *

TRANSCRIPT OF PROCEEDINGS
OF PUBLIC HEARING

Before: MARTHA ANSTY, ESQ., Hearing Officer
DR. JOHN A. LATSCHAR
DEBORAH A. DARDEN

Date : October 1, 1998, 7:00 p.m.

Place : Cyclorama Center
97 Taneytown Road
Gettysburg, Pennsylvania

By : Judith A. Greenholt, RPR
Reporter - Notary Public

* * *

PROCEEDINGS HELD THURSDAY, OCTOBER 1, 1998

* * *

DR. LATSCHAR: We'd like to welcome everyone here tonight. We'll get started as soon as we can, as soon as everybody has a seat.

This is a formal public hearing on the draft General Management Plan/Environmental Impact Statement for Gettysburg National Military Park. I would like to welcome everybody here.

To the handful who were waiting outside when we got back from dinner, I apologize. We thought we had arrangements for the building to be open at 6:30, but, obviously, we had a miscommunication. So, I apologize to those folks who were kept waiting for a while.

Our hearing officer tonight is Martha Ansty. Martha is from the Department of the Interior, Office of the Solicitor. And she will be conducting the meeting tonight – the hearing tonight.

MS. ANSTY: Good evening. We are here today so that you all can have a fair opportunity to comment on the record on the draft General Management Plan and Environmental Impact Statement.

How we are going to do this, it's going to be a three-hour hearing, starting at 7:00 and ending

## COMMENTS

## RESPONSES



at 10:00 tonight, so that everyone does have a fair opportunity to speak. And I can see we have a very large crowd. We are going to limit oral comments to three minutes. And I will signal to you after – you know, when you have one more minute to go, I will just do this (Indicating) so you can figure out what I am doing. And then I would appreciate when I say thank you that you can sit down so we can get everybody to comment.

I also want to keep you aware or make you aware that we are keeping the record open for any and all written comments until October 17. And I would definitely encourage anyone to make a written comment so that we can consider everyone's viewpoint in this process.

How we are going to do this is, if you remember when you came in, we had sign-up cards. They are pretty much in the order in which you appear. So, I will call your name, and if you can just walk up to either microphone, whichever is closer for you, and identify yourself to the court reporter and maybe spell your last name so we have a clear record.

And I'd like to remind you to direct your written comments to Superintendent Latschar.

Please don't forget that we will be

1 continuing this public hearing process on Saturday,
2 October 3rd, in this same auditorium at 2:00 p.m.
3 So, if you don't have an opportunity to speak
4 tonight, please, I encourage you to come in
5 on Saturday.
6 And just to kind of finally let you be
7 aware, we are not going to be answering questions
8 tonight. This is your opportunity to comment on the
9 record. So, we want your comments so that we can
10 consider them in the final draft - in the EIS and
11 GMP.
12 And one other thing. We are going to have
13 one break tonight. It is going to be approximately at
14 8:30 p.m. It will be for 15 minutes. It is for our
15 court reporter.
16 MR. STARK: I'd like to formally protest the
17 process of this meeting.
18 MS. ANSTY: That's fine.
19 MR. STARK: This is listed as a general
20 public meeting, and you are giving no opportunity for
21 the public to interrogate the architect of the
22 proposed changes. That would be part of the permanent
23 record.
24 MS. ANSTY: All right. Well, thank you for
25 the -

COMMENTS

RESPONSES

5

1 MR. STARK: My name is Craig Stark.
2 The second thing I'd like to protest in
3 regards to this —
4 MS. ANSTY: Yes.
5 MR. STARK: — is your time limit. You're
6 restricting the people's opportunity to free speech,
7 which is insured under the First Amendment of the
8 Constitution of the United States of America.
9 Thank you.
10 MS. ANSTY: Thank you very much, Mr. Stark.
11 We have your duly noted comments on the record.
12 I would like to start — I'd like to call
13 Thomas P. Wolf and have him comment first. Thank
14 you.
15 MR. WOLF: My name is Tom Wolf, W-o-l-f, and
16 I have lived in Adams County in Carroll Valley for 11
17 years.
18 I am in favor of the new visitor center and
19 the museum in expanded quarters, with increased
20 facilities and amenities, and with adequate parking.
21 The Kinsley plan may require some minor
22 adjustments, but I support it and certainly the
23 concept behind it.
24 Unfortunately, a small vociferous group of
25 local businesspeople and a few politicians have

## Tom Wolf

1 opposed the plan and the National Park Service
2 Management Plan for mostly selfish and shortsighted
3 reasons, mainly because they fear a possible
4 short-term effect on their tourist-related businesses.
5 A new visitor center and museum will surely
6 attract additional tourist traffic, and in the long
7 run, that will benefit all Gettysburg businesses.
8 The nation needs a new visitor center and
9 museum in Gettysburg, not only to accommodate and
10 improve increased visitor traffic, but to
11 appropriately preserve the Civil War artifacts now
12 deteriorating and to save the mural painting in the
13 outdated cyclorama.
14 I urge, I beg this small group of mainly
15 businesspeople to abandon their parochial and selfish
16 view and to support this nationally beneficial concept
17 of an expanded visitor center and museum to adequately
18 handle the ever increasing tourist traffic and to
19 properly preserve the many important artifacts so
20 lovingly collected by the Rosensteel family and
21 others.
22 Thank you for listening.
23 MS. ANSTY: Thank you, Mr. Wolf.
24 I'd like to call Sal Prezioso. Excuse me if
25 I mispronounce your name.

## COMMENTS

7

1 MR. PREZIOSO: Actually, it's Prezioso.

2 MS. ANSTY: I apologize.

3 MR. PREZIOSO: Actually, I was under the

4 impression that we could ask questions. So, I guess

5 I'll have to make a statement in that form.

6 My overall feeling is that we do need to

7 make some changes within the park. And I just had

8 three specific comments, I guess, to make.

9 Number one, with regards to the impact that

10 either — any of the plans will have on those

a 11 residents that reside within the boundary of the park,

12 whether there will be any changes that we should

13 anticipate in terms of our residents, I guess, that

14 reside within the park boundary. So, that is of

15 concern, because I'd like to get the answer to some

16 questions to that effect.

17 Number two, with regards to the woodlots

18 being cleared, my concern would be — and I am

19 assuming there are studies that need to be made before

20 woodlots are cleared and it would be a procedural — a

b 21 timely process. But I happen to live in an area where

22 there is a wooded lot across from me that's within the

23 park and, of course, on the other side is a

24 subdivision. My question is, not knowing what

25 woodlots would necessarily be cleared, would that

## RESPONSES

### Sal Prezioso

a NPS evaluated the anticipated impacts on the affected environment. These impacts are expected to be similar for those living within the boundary of the park or outside of the boundary. Because the impacts should be similar, the effects on park inholders were not analyzed as a separate category.

b Schultz Woods, located on the west side of West Confederate Avenue (where the stone wall is standing and where the Confederate cannon are located), is a historic woodlot and would remain under all the action alternatives.

The majority of woodlands that are proposed for removal are located within the central portions of the park (for example, between Devil's Den and Confederate Avenue). Their removal would reintroduce historic views of the battlefield, primarily on battle action sites, without introducing views of nonhistoric intrusions. However, NPS would also be removing woodlands, hedgerows, and other vegetative growth near or on its boundaries that currently obstruct historic views of the battlefield. Although some of these areas are adjacent to modern development, the increased ability to see the historic terrain and key topographic features would enhance visitor understanding of the battle and the significance of battle features that are currently obstructed by this incompatible growth. In many cases, nonhistoric woods that were planted or allowed to grow in order to hide modern development have obscured key terrain and fields of fire and thereby themselves detract from the 1863 appearance of the battlefield. As a result, some portions of the battlefield have not only physically changed in appearance but have ceased contributing in any significant way to visitor appreciation of these battle sites. NPS would not entertain any new introduction of wooded areas to obscure development if that new vegetation would obscure significant battle topography or historic views (fields of fire).

8

1 woodlot be cleared so I now have a great view of the
2 subdivision vis-a-vis the woods that are now there,
3 which has a much more pleasant effect, which,
4 obviously, is a concern?
5 And the other is a question with regard to
6 the rules on use of the facility with regards to tour
7 groups. And I happen to be in a business that
8 involves tour groups. Will there be any changes —
c 9 well, the question is, are there changes anticipated
10 in the use of tour buses that do not utilize licensed
11 guides, meaning they have been given a waiver,
12 particularly educational groups that have been given
13 waivers by the Park Service? The concern, I haven't
14 seen anything expressed that that would still remain
15 the status quo. Or should there be changes
16 anticipated in that area?
17 Thank you.
18 MS. ANSTY: I'd like to call Linda Bugash.
19 MS. BUGASH: I represent Mammy Ruggles Tent
20 Number 50 of York, Daughters of the Union Veterans of
21 the Civil War.
22 Our initial opposition to the building of
23 the new visitor center/museum by said foundation to
24 house the cyclorama painting and Civil War artifacts
25 still stands. The recent modifications to the

c As now, educational groups would not be required to use licensed battlefield guides as a result of implementation of any of the GMP/EIS alternatives.

## COMMENTS

9

a

1 original proposal does not change the fact that the
2 treasures of Gettysburg belong to all American
3 taxpayers and should not be removed from
4 government-owned property to property privately owned
5 for any amount of time. The Park Service is only a
6 caretaker of these Civil War artifacts.

b

7 Also, we do not agree that the former
8 Rosensteel building, present visitor center, should be
9 torn down. It has been part of Gettysburg since the
10 1920s and is a significant part of Gettysburg's
11 history. The building should be restored and used in
12 another capacity by the Park Service.

13 The argument made by the National Park
14 Service that our government does not have the money to
15 restore the present facility or build a new facility
16 at Gettysburg has been proven incorrect by the news
17 yesterday of an enormous government surplus. How much
18 time and energy has the National Park Service at
19 Gettysburg or the Secretary of the Department of the
20 Interior, Bruce Babbitt, spent writing to President
21 Clinton or Congress requesting the needed money?
22 The second concern of those of us who spend
23 a good deal of time walking the Gettysburg Battlefield
24 is the condition of the two existing rest room areas
25 at the Pennsylvania Monument and at Devil's Den. The

## RESPONSES

### Linda Bugash

a A major objective of the public-private partnership is to provide a long-term stable environment for the enhanced preservation of the park's museum collection and archival collection. These needs cannot be met in the current facility. The Letter of Intent between the NPS and the Gettysburg National Battlefield Museum Foundation guarantees that neither ownership nor control of the artifact and archival collections will ever leave NPS hands.

b The NPS has proposed the removal of the Rosensteel building because of its inability to adequately meet museum collection and visitor demands and because of its intrusion on the site of significant battle action and terrain. NPS proposes relocating visitor facilities to a site that would not harm or infringe upon significant park resources, such as the current Visitor Center (Rosensteel building) does. The building is not included in the park's List of Classified Structures, and is not considered eligible for listing on the National Register of Historic Places.

10

1 rest rooms are very small and the door on the women's
2 rest room across from Devil's Den is extremely
3 difficult to open. Also, the drinking fountain across
4 from Devil's Den has been shut off. Visitors walking
5 for miles on the battlefield should be able to get a
6 drink of water at the rest room areas. I have not
7 read the draft for the GMP from cover to cover, but I
8 have not been able to find the cost for improving or
9 updating the present rest room facilities.
10 Comfortable sized rest rooms and drinking water
11 fountains should be available for the many visitors to
12 the Gettysburg Battlefield.
13 Contrary to your opinion, those of us who
14 come to walk the battlefield will not spend additional
15 time or money in a new building.
16 Thank you.
17 MS. ANSTY: Thank you, Mrs. Bugash.
18 I'd like to call Gerald R. Bennett.
19 MR. BENNETT: Before I make my formal
20 comments, I want to publicly state that I am here as
21 strictly a private citizen. I am a member of the
22 Advisory Commission, Gettysburg National Military Park
23 Advisory Commission, and a member of the Board of
24 Directors for Main Street Gettysburg. And what I have
25 to say reflects in no way the opinion of that board.

## Gerald R. Bennett

| COMMENTS | RESPONSES |
|---|---|

11

1 This is strictly myself.

2 And after having attended almost two full

3 years — the majority of the meetings for two years

4 that surrounds this, I have the following comments.

5 I fully support the implementation of

6 Alternative C in the draft Management Development

7 Plan. I am confident that this alternative will

8 substantially improve the educational experience for

9 park visitors, best protect the historical resources

10 of the park and its archives, and maintain Gettysburg

11 as an important and desirable destination for people

12 interested in exploring our national heritage in the

13 years of our next century.

14 The substantial measures in the plan of the

15 NPS for the development of the town of Gettysburg and

16 to the visitors' interpretive experience is both

17 educational to the visitor and essential to the growth

18 and the economic health of the borough.

19 The proposed public/private partnership to

20 build a new and expanded visitor center at the LeVan

21 site with a modest and necessary level of commercial

22 venture is most appropriate in light of the balance of

23 positive benefit to park visitor and local community.

24 Thank you.

25 MS. ANSTY: Thank you, Mr. Bennett.

## COMMENTS

12

I'd like to call John Fenstermacher.

MR. FENSTERMACHER: Good evening. My name is John Fenstermacher. I am an attorney from Harrisburg. I am here as an individual that cares about Gettysburg and also as attorney for Angela Rosensteel Eckert.

For many months, many of you have voiced your opposition to the NPS's attempt to privatize the National Park. Tonight, we get one more chance to attempt to counter the one-sided propaganda that the National Park Service has spread by numerous meetings and articles throughout our country.

For once, I want to place certain matters on the record. Unlike private enterprise and unlike our government, the National Park Service has embarked on a journey to privatize our park and all the while ignored the law and reasonable business practices. While you and I go shopping, we check the prices, check the quality of the merchandise, and we look for the best quality and price. The National Park Service in choosing the alleged Kinsley proposal above all others had no plan, no land, no prices, and no feasibility studies to determine the propriety of this choice.

Because some Congressman or

## RESPONSES

### John Fenstermacher

13

1 politically-connected individual liked the Kinsley
2 group, it got chosen. It could not have been chosen
3 based upon its design, cost or location, because at
4 the time the NPS made the choice, there was no
5 budget. There were no final plans. And there was not
6 even an option on the ground upon which the facility
7 was to be placed. In the private sector, we refer to
8 this as bad business. And frankly, it is bad
9 business. Bad business using our tax dollars to
10 benefit a private enterprise is not the way we should
11 run our country.
12 Of course, along the way, the NPS recognized
13 maybe it was too commercial, maybe too big. So, let's
14 throw a bone to the people. Let's try to take the
15 wind out of the sails of the antagonist, even take the
16 wind out of the sails of Trent Lott. Let's downsize
17 it.
18 These negotiating tactics and public
19 relations ruses should not be used to ruin the legacy
20 of the Civil War or the legacy of the Rosensteel
21 family. It is time for this subterfuge to end. It is
22 time for the NPS to act like every other state or
23 federal agency and not as an automaton without any
24 external controls.
25 This park belongs to the people of the

14

1 United States. It does not and should not in any
2 sense belong to Mr. Kinsley or his foundation or any
3 individual.
4 MS. ANSTY: One minute.
5 MR. FENSTERMACHER: I find it incredulous
6 that the Gettysburg National Military Park could not
7 get funding for repairs, restoration, or construction
8 when we have a $70 billion surplus.
9 I could not understand how they admittedly
10 have allowed our precious artifacts to be destroyed or
11 stolen.
12 To you who have toured the facility like I
13 have, I challenge you to answer why doesn't the
14 storage facility where our treasures are stored have
15 simple dehumidifiers, the kind we put in our homes?
16 Why does the Park Service point to a door that permits
17 air to leak and say, This is evidence of the pervasive
18 deterioration of the building? Obviously, the Park
19 Service doesn't know what weather-stripping is.
20 MS. ANSTY: Thank you, Mr. Fenstermacher.
21 MR. FENSTERMACHER: I have the next speaker
22 yielding to me.
23 MS. ANSTY: No, we are not going to do it
24 that way.
25 MR. FENSTERMACHER: Well, I am going to

a

a The environmental storage contols within the collections storage area of the current visitor center are practically non-existent. There is neither heat nor air conditioning in the vast majority of the 6,000 square feet of storage space, which makes the temperature control for artifact preservation impossible. The entire 6,000 square feet area lacks humidity control, which makes it impossible to protect the artifacts from wide fluctuations in relative humidity. Finally, there is no air circulation system in the storage area. None of these problems can be solved in isolation. For example, the lack of temperature control is a major factor leading towards wide fluctuations in humidity. Likewise, it is impossible to provide heating and air conditioning (temperature control) without installing an air circulation system for the entire storage area. In 1988, the NPS estimated that the cost of correcting these basic environmental storage problems would be over $1.6 million (not including funds required to address any of the other storage deficiencies, such as lack of adequate storage space.)

The use of portable dehumidifiers would have a negligible effect upon these area-wide environmental deficiencies. Weather-stripping is used on all exterior doors, and is periodically replaced as necessary.

## COMMENTS

## RESPONSES

15

1 continue this statement.

2 MS. ANSTY: Your written comments are

3 invited.

4 MS. ECKERT: I'm sorry. I never told you

5 to —

6 MS. ANSTY: We are not going to defer to

7 other people.

8 MR. FENSTERMACHER: This is my client.

9 MS. ANSTY: No.

10 MR. FENSTERMACHER: I'm going to keep

11 reading. The NPS puts out artifacts to show decay,

12 but fails to tell you they were in the same

13 deteriorated condition when they were donated to we,

14 the people.

15 The trashing of our National Park at

16 Gettysburg by its administrator, the National Park

17 Service, must stop.

18 To this end, I present the following letter

19 from Angela Rosensteel Eckert to be read into the

20 record —

21 MS. ANSTY: Stop. Stop. Mr. Fenstermacher.

22 MR. STARK: They've ceased recording the

23 record.

24 Mr. FENSTERMACHER: Well, that's all right.

25 It will be —

1 MS. ANSTY: Mr. Fenstermacher, we will be
2 pleased to take your entire written statement.
3 MALE VOICE: I will yield my time, please.
4 MR. FENSTERMACHER: I want to read this. It
5 says, "Dr. Latschar" —
6 MS. ANSTY: We'll be happy to have your
7 written statement.
8 MR. FENSTERMACHER: — "I write to you on
9 behalf of the Rosensteel family."
10 MS. ANSTY: The other people are not going
11 to have an opportunity to —
12 MR. CABA: I would like to yield my time,
13 please.
14 FEMALE VOICE: I'll yield mine.
15 MALE VOICE: I'll yield mine.
16 MS. ANSTY: We are not —
17 MR. FENSTERMACHER: "I write to you on
18 behalf of the Rosensteel family. We are most troubled
19 by the National Park Service's efforts to remove 'The
20 Rosensteel Collection' from the premises owned by the
21 National Park Service to a property owned by a private
22 developer on sacred ground that should not be further
23 disturbed."
24 MS. ANSTY: Stop. Stop.
25 (The proceedings were off the record at this

## COMMENTS

17

1 point.)

2 * * *

3 MS. ANSTY: Mrs. Eckert, would you like to

4 speak?

5 MRS. ECKERT: I gave him my time and you did

6 not record it. And that is not fair at all. I am

7 going to push this now to the hilt.

8 MS. ANSTY: May I speak to Craig Caba.

9 MR. CABA: I'd like, as an officer of the

10 court, for you to have that, please.

11 MS. ANSTY: Thank you.

12 MR. CABA: And it deals primarily with

13 conflict of interest and a petition by a number of

14 residents for a suspension.

15 MS. ANSTY: Do you want to stand at the

16 microphone.

17 MALE VOICE: Would you repeat his name,

18 please.

19 MS. ANSTY: Craig Caba.

20 MR. CABA: The name is Caba, C-a-b-a.

21 And I would like to give that to you as an

22 officer of the court to present to the Solicitor or

23 the Inspector General's Office there at the Interior

24 Department.

25 And what it basically is is a petition by

## RESPONSES

### Craig Caba

18

1 numerous people here who would like a review of the
2 ethics statutes pertaining to participation of park
3 administration on various boards here in the
4 Gettysburg area. According to NPS rules and
5 regulations, and even the updated one dated the 18th
6 of September of this year, just a few days ago, it
7 clearly indicates that no such position should be held
8 on boards pending criminal penalties. So, if you
9 could take care of that, that would be most
10 appreciated.
11 MS. ANSTY: May I call Chris Madrid.
12 MS. MADRID: Hi. My name is Chris Madrid.
13 I have a master's degree in architectural history from
14 the University of Virginia.
15 I believe that the new General Management
a 16 Plan overlooks the architectural significance of the
17 cyclorama building and its contributions to National
18 Park Service history. This building is one of the
19 first visitor centers ever constructed in the United
20 States. The Park Service introduced the concept of
21 the visitor center in 1955 to incorporate visitor
22 facilities, interpretive programs, and administrative
23 offices in one centrally located structure. The new
24 building type was a key component of the Mission 66
25 program, a billion dollar, ten-year project to improve

## Chris Madrid

a In December 1995, NPS prepared a determination of eligibility for the Cyclorama Center designed by architect Richard Neutra. The NPS determination found that the building did not meet the criteria of exceptional significance necessary to be eligible for the National Register of Historic Places. This finding was concurred in by the Pennsylvania State Historic Preservation Officer in May 1996. Using this finding as a starting point, NPS developed the draft GMP/EIS proposal, which suggests, among other things, the relocation of the cyclorama painting to a gallery where NPS can better preserve it, the removal of the Cyclorama Center, and the rehabilitation of the park's cultural landscapes. In September 1998, after the issuance of the draft GMP/EIS, the Keeper of the National Register of Historic Places reversed this finding, and the building was declared eligible for listing on the National Register. In December 1998, NPS began consultations with the Advisory Council, the Pennsylvania State Historic Preservation Officer, and interested parties and individuals. The NPS prepared a Section 106 Case Report in accordance with the Advisory Council on Historic Preservation regulations (36 CFR Part 800.8). The Case Report and supporting materials were provided to the Advisory Council, the State Historic Preservation Officer, and all interested parties for a 30-day comment period. After considering the comments received from the interested parties, NPS revised Case Report and resubmitted it to the Advisory Council, the State Historic Preservation Officer, and the interested parties, for a second 30-day review period. Comments received from the interested parties, and NPS responses to those comments, were discussed during the April 20, 1999, public consultation meeting. Comments received during that meeting will be incorporated into a final Case Report. On May 14, 1998, the Advisory Council announced its support of the draft GMP/EIS proposed treatment for the park's cultural landscapes, the cyclorama painting, and the Cyclorama Building. Before undertaking these actions, NPS would consult with the Advisory Council and the Pennsylvania State Historic Preservation Officer to develop appropriate mitigation policies with regard to the removal of the Cyclorama Center.

# COMMENTS

# RESPONSES

19

park facilities nationwide in preparation for the National Park Service's 50th anniversary in 1966. The Gettysburg Cyclorama is one of only five visitor centers of the 100 constructed during the program commissioned to private architects.

Richard Neutra of the firm Neutra & Alexander completed two visitor centers for the National Park Service—the Gettysburg Cyclorama, which he envisioned as a memorial to Abraham Lincoln, and the Petrified Forest Visitor Center in Arizona, a building designed to complement the desert landscape. These buildings, as well as three others, symbolize a new era in Park Service history and are the first representatives of a new building type, the visitor center.

a (cont.)

Last week, this building was declared eligible for the National Register of Historic Places under two criteria—as a significant work of Richard Neutra and for its place within the historic context of the Mission 66 program.

The stated mission of the Gettysburg National Military Park is to preserve and protect resources associated with the Battle of Gettysburg and the Soldiers' National Cemetery. But as managers of a federally-owned site operated by the National Park

## Philip Stewart

20

a (cont.)

1 Service, the administrators of Gettysburg have a
2 responsibility to account for the park's contribution
3 to wider movement in American history.
4 This building as one of only five original
5 visitor centers in the country designed by a noted
6 private architect should be reconsidered for
7 preservation under the new General Management Plan.
8 Thank you very much.
9 MS. ANSTY: Thank you.
10 Can I have to speak Philip Stewart, please.
11 MR. STEWART: Spelled S-t-e-w-a-r-t. And
12 I'd like to have the spelling of the hearing officer's
13 name.
14 MS. ANSTY: My name?
15 MR. STEWART: Yes.
16 MS. ANSTY: A-n-s-t-y.
17 MR. STEWART: A-n-n -
18 MS. ANSTY: A-n-s, as in Sam.
19 MR. STEWART: Okay.
20 MS. ANSTY: T as in Thomas, and Y as in
21 yellow.
22 MR. STEWART: Thank you.
23 MS. ANSTY: Certainly.
24 MR. STEWART: I am not a merchant, and I am
25 not a politician, but I did buy the cyclorama - I

# COMMENTS

21

1 mean, the — we called it the Electric Map building at
2 the time. And I bought Fantasyland, and I bought many
3 other properties in Gettysburg. And let me tell you
4 something, the location of these buildings are where
5 they should be and where they should remain.
6 I have nothing else to say, but I'd be happy
7 to yield the rest of my time to Mr. Fenstermacher.
8 MS. ANSTY: I'm sorry, but we are not going
9 to do that.
10 I'd like to call Elizabeth Daniels.
11 MR. FENSTERMACHER: I'd just like to lodge a
12 formal objection that I have never been to public
13 hearings in my 20 years of practice where we have not
14 been able to have somebody yield to another speaker.
15 MR. STARK: John, is your statement on the
16 record?
17 MS. ANSTY: Mrs. Elizabeth Daniels.
18 MS. DANIELS: My name is Elizabeth Daniels,
19 and I have lived in Gettysburg since 1954. I have
20 read not all of the book, but quite a bit of it and I
21 have some kind of miscellaneous comments. And
22 unfortunately, some of them have to do with questions
23 that didn't seem to be — that doesn't seem to be
24 answered by all of this.
25 For starters, toward the end of that book,

# RESPONSES

## Elizabeth Daniels

1 costs are given, or estimated costs, for all sorts of
2 things. They seem to be quite high to me.
3 Under Alternative C, adding 115 acres of
4 woods is expected to cost $89,700. Removing 576 acres
5 of woods, it will cost two thousand, 695,680.
a 6 MALE VOICE: Two million.
7 MS. DANIELS: Two million. Isn't that what
8 I said? I said two million, 695. Okay. Adding 65
9 acres of thickets — I don't know why it is hard to
10 add thickets. It's supposed to cost $50,700. And 278
11 acres kept on as woodlots or converted to woodlots,
12 $216,840.
13 Another matter, it says that nonhistoric
14 ponds and dams, some of them will be removed. It
15 doesn't specify where they are. This is on Page 76 I
b 16 saw that. Is one of them going to be at Fantasyland?
17 And it seems to me that with that pond removed, that
18 would be a wetland. And I don't know whether they
19 ought to put, well, the maintenance buildings that
20 are planned to be there.
21 Pesticides, if orchards are put in, how
22 many — 160 acres of orchards. Certainly, they are
c 23 going to use — have to use pesticides or they are
24 going to cause a major headache for orchard owners
25 around here with all these nonprotected trees that

a The cost estimates for tree removal are high because of the care the NPS would take to minimize the impacts to the park resources and the environment. The park would use best management practices and would phase large projects in order to reduce the effects of cutting. In addition, the type and quantity of trees to be cut has yet to be determined. Therefore, no value for those trees can be estimated. Consequently, the cost estimates for tree removal are calculated with a standard fee on a per acre basis. As implementation plans are developed, the costs could be reduced though the use of partnerships, cooperative agreements, or the use of volunteers.

Costs for adding thickets and maintaining woodlots are high because many of those areas are currently wooded and the area would need to be cut first and then seeded with native plants. During the first few years, intensive management would occur in order to prevent the areas being invaded by exotic plant species. Through the use of volunteers, costs could be reduced.

b Currently, there are three man-made ponds in the Fantasyland area. The proposed new museum complex does not require removal these ponds, although the draft GMP/EIS did recommend removal of hazardous dams. If the park does relocate the park headquarters, campground, and picnic area as proposed in the three action alternatives (section 2.7.3) the dams may have to be removed. Before any actions were initiated, the NPS would consult with appropriate state and federal agencies that oversee wetland protection. The NPS would also follow its wetland policy. This would include a preparation of a Statement of Findings (SOF) for any affected wetlands, including the man-made ponds or other affected wetlands because of the ponds removal. A SOF is comprised of a map that identifies the affected wetlands, a detailed description of the wetlands, a full disclosure of the adverse impacts to the wetlands, a description of alternatives to the project, a description on how the preferred alternative would minimize impacts to the wetland(s), and a description of proposed compensation, i.e., what wetland area(s) would be restored to compensate for the loss or degradation. The SOF would also include a map of the compensation area, a description of wetland functions to be restored, a description of the restoration process, the anticipated schedule for project completion, the anticipated timing for full wetland functioning, monitoring and maintenance requirements, and the funding source. The superintendent or his staff would develop the SOF in coordination with the Chief of the NPS Water Resource Division or a certified Wetland Scientist and with other appropriate state and federal agencies. The Regional Director has final approval of the SOF.

## COMMENTS

23

1 have all kinds of pests in them.

d

2 Let's see. We are going to make farm fields
3 smaller, bring it back to what it was like in 1863.
4 At present, those are bringing in $33,000 yearly. It
5 will be less when they are smaller as it points out in
6 this document. It doesn't say how much less.

7 They are also — I didn't get the cost of
8 all the fencing that's going to be involved, but it's
9 a lot.

10 MS. ANSTY: Mrs. Daniels, your time is up.
11 Would you like to sum up.

12 MS. DANIELS: Well, I was being
13 miscellaneous, wasn't I?

14 MS. ANSTY: I'd like to call Margaret
15 Blough.

16 MS. BLOUGH: I'll be making more extensive
17 comments in writing, but I just wanted to be on the
18 record as saying that I have read the entire General
19 Management Plan, and I want to speak in favor of
20 Alternative C. The Gettysburg National Military Park
21 is a gateway to the Civil War for much the American
22 public. That experience can make them — can and, in
23 many cases, has made them committed to Civil War
24 preservation in general. Making this experience the
25 best educational experience for these members of the

## RESPONSES

c The draft GMP/EIS proposes planting up to 160 acres of orchards to help restore the historic landscape of the battlefield. Under all the action alternatives, NPS would manage orchards to maintain their general historic appearance rather than for fruit production. Integrated Pest Management (IPM) techniques would be used to maintain the orchards. Pest control would be modified to treat only those pests that threaten the health and structural stability of the trees. Action thresholds for treating pests would be raised so that pesticides are only applied when severe damage or tree loss is imminent or could be preventive. NPS policy states that the regional IPM coordinator and the Washington office must review pesticide use annually (NPS 77, 2:223). Environmentally friendly alternatives to pesticides would be utilized wherever possible. Pruning would also be used to remove diseased wood and other conditions that could threaten the health of the trees. NPS would cooperate with the State Extension Agency to ensure that park actions would not affect any commercial fruit growers in the area.

d In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed and should therefore result in a stable farm income.

24

1 public is critical to the overall effort for Civil War
2 preservation.
3 The issue is not whether or not there is a
4 budget surplus. What Senator Santorum and Congressman
5 Goodling in the recent Gettysburg Times article and
6 Senator Lott in what he did not say as an alternative
7 have made it clear that there could be a $70 trillion
8 surplus, but Congress has no intention of funding this
9 visitor center.
10 So, we have one of two alternatives. We can
11 let things stagnate or we can find alternatives. I
12 believe that the Kinsley proposal, of all the possible
13 methods of funding that have been explored in detail,
14 provides the best way and the least intrusive to the
15 park's mission in funding the visitor center.
16 The General Management Plan, Alternative C,
17 I believe, places a workable aspect, the best way of
18 finding a balance between preserving what happened
19 here in 1863 to the armies, to the civilians, and
20 placing it in the context of the Civil War and meeting
21 the needs of the fact that this is a heavily visited
22 venue. And I think overall, it is our best
23 alternative and a very well thought out and researched
24 alternative.
25 MS. ANSTY: May we have Michael Lyons come

## Margaret Blough

## COMMENTS

25

1 comment.

2 MR. LYONS: Michael Lyons, L-y-o-n-s. I

3 have no notes in front of me, but I think I can take

4 my First Amendment rights inside my three minutes and

5 get it said.

6 Basically, the question comes down to what

7 is more important. Is it more important that we take

8 the history that so many people and so many

9 organizations are trying to rub out, change, and

10 manipulate for their own purposes and keep it, make it

11 better, and make it more available to people, or do we

12 concern ourselves with how much popcorn we are going

13 to sell, how many Big Macs, how much coin we can get

14 for wax? Which is more important?

15 It seems to me that some people feel it is

16 more important that they get the coin in their pockets

17 right here, right now, not concerned with what my son,

18 who I just had — my wife did — 12 weeks ago, what's

19 he going to do 20 years from now when he wants to come

20 to Gettysburg. Is he going to be concerned with where

21 he gets his Big Mac, where he gets his lunch? Is he

22 going to go here? Is he going to go there?

23 I want him concerned with the history that

24 many people, especially in our government

25 organizations, unfortunately, are taking the time now

## RESPONSES

### Michael Lyons

1 to try and change, to try and manipulate, to try and
2 work for their own means and their own gains.
3 Everybody is concerned about what corporate
4 people are doing to this country. They are concerned
5 about what government organizations are doing to this
6 country. And this seems to me to be a perfect example
7 of both. Small interest groups, small businesses who
8 are not going to lose that much business in this town
9 simply due to the moving of a building to another
10 location are more concerned about how much money they
11 are going to make than about preserving and keeping
12 the history that we need to teach our children about
13 day by day as a part of their lives. I want to be
14 able to bring my son to this town in 10, 15, 20 years
15 and have him learn the right end of history.
16 I could — this building, yes, it is a part
17 of history. It is a part of Gettysburg's history
18 after the war. Is the town of Gettysburg about, oh,
19 we built this building after the war? Oh, a hundred
20 years from now, gosh, I guess we can't tear down
21 Wal-Mart because, you know, it is a part of town
22 history now.
23 We have articles of history. We have
24 uniforms, weapons, furniture, pieces of paper, written
25 documents that are rotting, mildewing, falling apart

## COMMENTS

27

in closets, in buildings when they should be in a properly maintained new building where people can see them. If you are not concerned about the future of the articles and materials that we have now, you might as well torch it and let it burn. And I don't want to see that happen.

I think the best option now is to move into a new building, remove this, yes, historical building, make mention of it, build a model of it, do something you want to do with it, but make Gettysburg what Gettysburg is about. Gettysburg is not about the cyclorama. Gettysburg is about the Battle of Gettysburg and how it was a turning point in this country's history, not about how much popcorn we are going to sell.

Thank you very much.

MS. ANSTY: Mr. Lyons, your time is up.

I know I am going to mispronounce this. It is Bill Heph — and I can't read the rest of it. Montana.

MR. STEPHENS: That will be Bill Stephens, S-t-e-p-h-e-n-s.

MS. ANSTY: I apologize.

MR. STEPHENS: Is the Superintendent here? Is John Latschar here?

## RESPONSES

### Bill Stephens

1 MS. ANSTY: Yes. John Latschar is right
2 here.
3 MR. STEPHENS: My honor.
4 So, yeah, I'm a tourist. And I come here
5 from Montana. And I come here every once in a while,
6 whenever I get a chance, whenever I can convince my
7 wife to stay home.
8 But there is no place — listen, I want to
9 tell you, I have been everywhere but the electric
10 chair and seen everything but the wind, and there is
11 no place on the planet like Gettysburg. And I come
12 here — this is more than an honor to be here. This
13 is a spiritual thing. For me, it is, and I reckon it
14 is for a lot of people.
15 And I come out here in the dead of winter
16 last — January, see. And I don't care who gets my
17 money. I spent $800 in January and I spent probably a
18 thousand dollars since I have been here. And I don't
19 care about the money. It ain't important.
20 I want you guys to get together and preserve
21 this place because — watch the tourists. Watch the
22 guys that come here. Guys are walking around pushing
23 tears out of their eyes all the time, because it's
24 just too much.
25 Come to — Gettysburg is just too much.

1 There's no place like it on the planet. I want you
2 guys to take care of this place.
3 I think Plan C — I got a thing in the
4 mail. I was on the mailing list. Kathy Lawhon, is
5 she here?
6 MS. DARDEN: Katie Lawhon
7 MR. STEPHENS: Katie. She put me on the
8 mailing list and she sent me the book. It was an
9 honor to get that. So I returned honor for honor and
10 read the sucker cover to cover. I don't see no
11 problem. I don't live here, you know. I live north
12 of Yellowstone National Park. And the people there
13 with the hotels and motels and chain restaurants and
14 all that junk, they worry about the same things you
15 guys do. And every year, it's the same thing. Nobody
16 goes broke. There's never no last piece of pie.
17 There's plenty to go around. There's always plenty to
18 go around.
19 I seen a man's name on the list back there
20 from Washington. He must be a tourist. I bumped into
21 people from California all over the place, you know.
22 You guys are going to get it. You guys want
23 the money. And I'll tell you, Gettysburg is the
24 biggest thing. It's very, very big and I don't want
25 you guys to turn it into a petty thing by worrying

1 about who's going to get the money and who's going to
2 get the job. Do you know what I mean? It's too
3 important for that kind of junk.
4 And I guess that's all I want to say, other
5 than — no, that isn't. Actually, as far as the
6 proposal is concerned, I did have only like two things
7 that concerned me. I lived in Bismarck, North Dakota,
8 once and Bozeman, Montana, which is just over the
9 hill, and they had nice museums, nice comfortable
10 museums. And whenever you need them, you seen all of
11 the artifacts and everything was right there, right up
12 front for you to get a good feel of why you were
13 there. And then they got interested in building
14 bigger facilities, modernizing, you know, kind of like
15 you guys have your classrooms and conference rooms and
16 that sort of stuff. It all sounded pretty good. And
17 when you went back to the museums, you couldn't find
18 the displays. And I don't want that to happen. I
19 don't want you to spend — you'll wear yourself out
20 going from one display case to another display case to
21 find out what used to be right there in front of you.
22 So, don't do it. Don't hide that stuff.
23 Another thing is, when they modernize these
24 places —
25 MS. ANSTY: Your time.

# COMMENTS

31

MR. STEPHENS: My time is up?

MS. ANSTY: Yes.

MR. STEPHENS: Well, hooray for the union.

MS. ANSTY: Can I have Dan Hoffman, please.

MR. HOFFMAN: I'd like to make a little comparison. I want to compare what is happening right now or will happen in the future to an earthquake. Anybody that knows anything about geology, we know that with earthquakes, especially in California, there is strain on the earth for maybe 20 years. It's straining for change. And all of a sudden, I read where the earth jumps 13 feet in an instant.

Now, we at Gettysburg, we have been straining for many years. We don't seem to be — we didn't seem to be getting anywhere and now we have a General Management Plan that opens up these vistas of new opportunity to educate. And I really feel for the half dozen people who I have witnessed in the last couple of years. Every meeting that we have had here, it has been the same story over and over again. They are resisting that change. And one of these days, it's going to go like that. And if they don't bend with it and join in, I feel for them.

Thank you very much.

MS. ANSTY: Thank you. Roger Steele.

# RESPONSES

## Dan Hoffman

32

1 MR. STEELE: Roger Steele. And that's
2 spelled S-t-e-e-l-e.
3 I am here as a private citizen of Adams
4 County, from the Littlestown region. And I would
5 simply like to state that I support the approval and
6 implementation of Alternative C of the draft General
7 Management Development Plan. And the reason I do this
8 is I feel that it could provide many benefits and
9 opportunities for the residents of Gettysburg, Adams
10 County, and for the National Park Service.
11 Thank you.
12 MS. ANSTY: Thank you.
13 Conrad Richter.
14 MR. RICHTER: That's R-i-c-h-t-e-r as in the
15 Richter scale. I didn't set that up, honestly.
16 I speak also as a private citizen. And I
17 must say that I await with some trepidation the design
18 and construction of the new visitor center. I think
19 it is imperative that the quality of construction and
20 design should be ageless if, indeed, this does come
21 about. The design should certainly be compatible with
22 contemporary structures of the battle era. And the
23 building should be platted and designed to accommodate
24 expansion without compromising architectural features
25 and its utilitarian nature. It is almost inevitable

## Roger Steele

## COMMENTS

33

1 that it will ultimately be inadequate in size.
2 My own selfish interests — for example, the proposal
3 calls for approximately 1,700 square feet of space for
4 research in the library. This is surely inadequate.
5 Now, even though the current park
6 superintendent is not interested in making Gettysburg
7 the center for Civil War research, I can personally
8 find nothing wrong with such a concept.
9 Furthermore, Page 78 of the proposal claims
10 that the Gettysburg National Military Park owns one of
11 the most significant collections of Civil War
12 artifacts in the United States. And the 350,000 plus
13 collection of archives documents the preservation and
14 commemoration of the field. These invaluable
15 resources are of limited value unless scholars have
16 access and facilities to utilize them.
17 Finally, one other criticism I have is that
18 there is at the present moment no firm plan or
19 apparently a firm concept for making the National
20 Cemetery easily accessible to visitors. Since the
a 21 National Cemetery is one of the key elements of
22 Gettysburg — or the General Management Plan, this
23 requires hard study and planning. We have heard some
24 vague talk about a shuttle, a walking trail, and
25 parking on Baltimore Street. My personal view is that

## RESPONSES

### Conrad Richter

a Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the new Visitor Center to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

34

1 it is imperative that this matter be resolved before
2 the plan goes too much further.
3 Thank you.
4 MS. ANSTY: Thank you.
5 Elaine Jones.
6 MS. JONES: I am Elaine Jones. I have lived
7 in the Gettysburg area since 1964, raised three
8 children here, love it here, work in Washington, but
9 happy to come home every weekend so I can enjoy the
10 beautiful surroundings.
11 I was really distressed when I learned that
12 the — all that I have been hearing about this visitor
13 center was only a part of the story. And what we
14 weren't hearing about was what was going to happen to
15 the trees.
16 I'd like to summarize a letter that we have
17 written as a comment to Dr. Latschar.
18 Although it is not easy to understand the
19 General Management Plan — those of you who have tried
20 know what I am talking about — we have learned that
21 this plan would have serious consequences for the
22 woodlands in the Gettysburg area.
23 What we found is that there are four
24 alternatives. And one of them is completely
25 dismissed, Alternative A, as being completely

## Elaine Jones

## COMMENTS

35

1 inadequate. The plan says that this would be a do
2 nothing approach which would result in continued
3 deterioration of the park's natural and historic
4 resources. The other three are all based on the
5 premise that the park lands should be returned to the
6 way the landscape appeared in 1863 as much as
7 possible. There is no other – there is no in
8 between. There is an in between in how many trees
9 might come down or some of the other details. But
10 that's the premise.

11 We were distressed, a number of us, to
12 discover that this calls for removing 576 acres of
13 woodlands, which is almost a third of the woodlands in
14 the area. We think this would greatly diminish the
15 beauty and the environment of the wonderful National
16 Park land that Congress set aside in commemoration of
17 the historic battles which occurred here.

a 18 Even if cutting down the trees gave a better
19 view of the Civil War battle tactics, is this really
20 more important than protecting the ecosystems of the
21 birds and wildlife that rely on these woodlands?

22 The plan addresses the legal requirements of
23 the Environmental Impact Statement and claims that
24 grasslands are better than woodlands for some
25 species. And I am sure they are. And while that may

## RESPONSES

a NPS policy (NPS 77, 2:2) states that "The purposes of vegetation management are as diverse as the National Park System itself, ranging from perpetuating natural processes in natural zones to conserving the historic values of cultural zones...." Vegetation management is defined as the maintenance, establishment, or restoration of target vegetation that meets a park's management objectives. This may include an objective to preserve a historic site at a point in time in which periodic intervention may be required to counteract natural successional processes (NPS 77, 2:5).

The draft GMP/EIS alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that need to be considered before any implementation plans are improved. The no-action alternative, in which no trees are removed, favors forest species, most of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to ensure the action is not affecting any federal or state listed threatened or endangered species.

The process by which trees may be removed would vary depending on the site. Best management practices would be applied to all sites to minimize the impact of tree removal on the park and its resources. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. This would have minimal impact on most species because most of the wooded area would be retained. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available to open those areas and maintain them, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas. Cutting during the winter when the ground is frozen would reduce soil erosion and sedimentation in the streams while also not affecting species during their breeding seasons. Seeding and the planting of native plants as soon as possible after the cutting would also reduce erosion and help prevent the establishment of non-native species.

36

1 be true, common sense tells us that removing as many
2 as 300,000 trees will cause erosion and the
3 destruction of habitat for a vast number of species.
4 And the plan itself admits that it will be a negative
5 impact on 30 percent of the species that are in the
6 woodlands.
7 We object to the selective logic used in the
8 plan that says that we should remove the trees but not
9 the monuments, the tower, the paved roads, and some of
10 the power lines and other things that have been a part
11 of the natural development of any area.
12 MS. ANSTY: Mrs. Jones, your time is up. Do
13 you want to just summarize your last comment?
14 MS. JONES: In our judgment, the spending of
15 over $2 million to take down the trees is shortsighted
16 and not looking at the value of the entire area for
17 the visitors and the people who live here.
18 Thank you.
19 MS. ANSTY: Can we have William Jones.
20 MR. JONES: My name is William Jones. And I
21 am some relation to the previous speaker. And I am
22 actually speaking also on behalf of my children and
23 the children of Adams County whose history is also
24 part of the battlefield and is their own life on the
25 battlefield as they have grown up.

## William Jones

| COMMENTS | RESPONSES |
|---|---|
| 37<br>1 We are well aware that this is a national<br>2 place, a place of great national significance. But it<br>3 is also a place of serenity, beauty, and history for<br>4 the local people. We have seen it in many ways as a<br>5 protection from development. And yet, to destroy<br>6 habitat, to destroy trees, to destroy close to 600<br>7 acres of trees seems to be counterproductive to the<br>8 kind of protection that the local people have had for<br>9 many years. So, I speak for my children, as the<br>10 Lorax, let's save the trees.<br>11 MS. ANSTY: Hank Whitfield.<br>12 MR. WHITFIELD: That last name is spelled<br>13 W-h-i-t-f-i-e-l-d. I have been a resident of<br>14 Gettysburg for 40 some odd years now, and I have<br>15 worked for the National Park Service for that amount<br>16 of time. I was a businessman here in town.<br>17 I think we are running into mass confusion<br>18 through lack of communication, which we are trying to<br>19 take care of here. And I think we have the ball<br>20 rolling. And once it got going, it went a couple of<br>21 directions. And I think this is where our confusion<br>22 started coming in.<br>23 I don't know if I put myself for or against<br>24 the proposal. I am confused about the fact that we<br>25 couldn't expand our present position, we couldn't | **Hank Whitfield** |

1 update our present position, we couldn't update our
2 present buildings.
3 I have heard arguments why we don't want a
4 cyclorama here. I have a hard time going along with
5 this. If you are going to expand the cyclorama, I
6 don't know how you are going to expand the picture
7 that's inside it. You can only put so many people
8 inside this circular picture. That can be corrected,
9 what we've got here.
10 There's lots of things that could be done
11 with what we have to go with with the monstrous
12 proposal which is ahead of us. And the many
13 directions it is going in I think leaves a lot of
14 confusion. I think we need to clear up the smoke a
15 little bit.
16 Thank you very much.
17 MS. ANSTY: Thank you.
18 Gene Albright.
19 MR. ALBRIGHT: Good evening. I think you
20 have the spelling. Right? If you pronounced it
21 right, you spelled it right.
22 I have been a native of Adams County now 60
23 years and I love it deeply. I have no children for
24 whom I am concerned about the welfare and future of
25 the battlefield, but I have a deep concern for future

## Gene Albright

## COMMENTS

39

1 generations. And so, I enter this into the public
2 record.
3 Those who own or have decision-making
4 responsibility for large areas of land have a special
5 obligation that is not always taken into consideration
6 in modern America. The obligation is that of
7 stewardship. The concept is both biblical and steeped
8 in ecological principles of the most forward-looking
9 of society's deep thinkers. The land, air, water,
10 trees and other vegetation must be protected from
11 unwise use because we are responsible for its
12 protection for our relatively short time. It has been
13 protected by those who came before us, and we owe it
14 to those who come after us to hand it down in good
15 condition.
16 Some would insist that the hundreds of acres
17 planned for the chain saw are only a tiny fraction of
18 the acreage now forested in this area. This sort of
19 statistical manipulation ignores the real truth, that
20 virtually all the rest of the forests are subject to
a 21 cutting, usually long before the century mark of the
22 beginning of maturity for a tree. Therefore, a
23 special obligation is placed on the National Park
24 Service to hold its forests in special regard — a
25 sylvan sanctuary in which some measure of the quality

## RESPONSES

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The draft GMP/EIS alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that need to be considered before any implementation plans are approved. The no-action alternative, in which no trees are removed, favors forest species, most of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. None of the species that may be affected by the removal of trees are unique to the Gettysburg area, so any of these actions would not result in the destruction of any species. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed threatened or endangered species.

## Michael McCloskey



1 of ancient forests can be appreciated by visitors and
2 local citizens alike. Certain species can only exist
3 in such a protected environment, and it is becoming
4 increasingly apparent to the thoughtful that species
5 destruction is one of the most evil acts of commission
6 or omission that humans perpetrate.
7 And so, I call on the leadership in the
8 National Park Service, reconsider your priorities and
9 call off the chain saws. Otherwise, their din will
10 echo beyond the grave of all present today.
11 Thank you.
12 MS. ANSTY: Margaret Counts.
13 MS. COUNTS: That's me. I'll pass or I can
14 yield to the gentleman from Montana.
15 MS. ANSTY: Well, you can't do that.
16 Michael McCloskey.
17 MR. McCLOSKEY: How do you do? My name is
18 Michael McCloskey. And that's spelled
19 M-c-C-l-o-s-k-e-y.
20 I have been in opposition to the plan as
21 proposed at the last meeting. I still have not been
22 able to quite understand exactly what it is the park
23 wants to move.
24 When I came here as a young boy, I came to
25 this visitor center and this cyclorama. And I must

## COMMENTS

41

1 say that this cyclorama was probably one of the most
2 lasting memories I have had when I came here, as well
3 as the visitor center. To me, these two buildings at
4 their sites have great meaning to me, and they also
5 have great historical importance, as the young woman
6 had spoken of earlier. And I must oppose the removal
7 of these buildings.

a
8 I don't understand why we cannot expand on
9 them, improve them, especially — that would be much
10 better than the tune of $40 million proposed for the
11 current building, as well as building a new center as
12 well. Why not make a smaller center in a different
13 location that's much more agreeable to everybody
14 involved with the necessary temperature changes?

15 I have also been a reenactor and living
16 historian for 15 years. These artifacts are very
17 important to me personally, to myself, to my family,
18 for my heritage. I have three family members
19 personally who fought here, and it has a very deep and
20 meaningful effect, this town does. And I was drawn
21 here approximately five years ago. I hope to stay
22 here a lot longer. I hope I can spend the rest of my
23 days here. And I hope that it all works out for the
24 best.

b
25 And I am certain that given deliberation and

## RESPONSES

a Between August 1995 and April 1996, NPS prepared a *Draft Development Concept Plan/Environmental Assessment* (DCP) to explore alternatives for the needed facilities. Development Concept Plans are tools that NPS uses to solve facility concerns. The DCP included four alternative concepts for the new facilities: (a) a no action alternative, (b) building a collections and archival storage facility and leaving the Cyclorama and visitor centers as they are; (c) building a new Cyclorama building combined with collections and archival storage and renovating the existing visitor center in place, and (d) building a new combined facility incorporating all these uses. The DCP was put out for public review for 45 days in April 1996. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. The majority of the public comments which were received agreed with the NPS' choice of Alternative D, building a new combined facility in a new location.

b As outlined in Chapter 5, "Consultation and Coordination," of the draft GMP/EIS, NPS has provided numerous opportunities for public comment as draft plans were formulated. In 1995, NPS began considering alternatives for development of collections storage, museum and visitor center facilities. The DCP process included an Environmental Assessment with a formal scoping meeting, a formal 30-day review period for the scoping documents, 2 sets of subsequent public workshops, the release of a draft DCP/EA evaluating 4 alternatives and a 45-day public review period.

During the development of the draft GMP/EIS, four newsletters and an informational mailing on the proposed museum complex were sent to the 3,800 people on the GMP mailing list. In response, NPS received more than 3,300 comments, including 960 individual letters and more than 2,800 responses to questionnaires or newsletters. The public responses substantially influenced both the draft GMP/EIS alternatives as presented, and NPS negotiations on the visitor center/museum proposal.

As a part of the draft GMP/EIS process, NPS conducted 30 public workshops, open houses, or hearings, including 6 presentation/ question and answer workshops during the formal 60-day public comment period on the draft GMP/EIS. Over 500 public comments were received during the formal public review

42

b (cont.)

1 interaction between the committees and the citizens —
2 we've got to have a meeting where questions can be
3 answered. Unless the citizens can have their
4 questions answered directly from the committee, I
5 don't see any chance of any true movement forward in
6 getting this plan implemented.

7 Aside from that, all I can see is that this
8 is a plan that has already been set in stone.
9 That is all I have to say. Thank you for
10 your time.
11 MS. ANSTY: Tammy Myers.
12 MS. MYERS: Good evening. My name is Tammy
13 Myers, M-y-e-r-s. I am a citizen of the United
14 States, a resident of the Borough of Gettysburg, and I
15 am also a businessperson here in town.
16 I believe that Gettysburg is more than a
17 battlefield. It is also a community. And therefore,
18 I feel it's important to address the issues of the
19 economic impact, even though I do feel there are other
20 issues to this particular plan.
21 I'd like to begin with some quotes. On
22 February 24, 1998, deputy director of the National
23 Park Service Dennis Galvin had stated in his testimony
24 before the Senate, There will be no commercialization
25 of the park. In the February-March issue of this year

## Tammy Myers

## COMMENTS

43

1 in the Civil War News, Superintendent John Latschar
2 stated, There will be no commercialization of the
3 park. Most recently, on September 25, 1998, U.S.
4 Senator Rick Santorum stated to Senators Trent Lott,
5 Jim Jeffords, and Bob Torricelli that a July 16 letter
6 of intent refined the proposal removing all commercial
7 aspects of the proposed visitor center.
8 I looked at the definition of
9 commercialization, commercialize. And in the American
10 Heritage Dictionary of the English language,
11 copywritten 1969, it states, "To make commercial by
12 methods of business, to exploit, do or make mainly for
13 financial gain, to sacrifice the quality of for
14 profit."
15 In light of the aspects that are going to be
16 part of the plan, a film theater, a cafeteria, a tour
17 center, and the expanded Eastern National Bookstore,
18 and the addition of a museum store, is this not
19 commercialization? Some will say it is being operated
a 20 by nonprofit. That isn't the answer. The answer is
21 not whose pocket the money is going into, but whose
22 pocket the money is going to be leaving. If millions
23 of dollars are leaving our community, it doesn't
24 matter who is taking them. The fact is, if a
25 nonprofit is operating food service, it gives little

## RESPONSES

a NPS evaluated the impact of the book and museum store, limited food service, licensed battlefield guide tour center and for-fee interpretive programs, along with the other changes proposed in the draft GMP/EIS alternatives, on the local tourist economy. The analysis found that there would be positive impacts on local businesses. Although NPS estimated that more dollars would be captured by the proposed facilities than are captured in the existing visitor center facilities, local businesses located outside of the park boundaries would also benefit. For example, in Alternative C, although in-park expenditures would rise from $3,233,775 in 1996 to $8,730,700 in 2007, out-of-park or expenditures in the community would also rise, from $112,850,385 in 1996 to $137,129,300, or 21.5%, in 2007. In other words, Alternative C would generate almost $30 million dollars in additional visitor expenditures and more than $24 million dollars of that would go to local commercial businesses outside of the park's boundaries. The analysis also showed that all sectors of the tourism industry, including food service, would remain stable or see increases in visitor expenditures under this alternative.

1 solace to the food operators in town. It will have
2 the same effect as to whether it's a for profit.
3 Likewise with the Eastern Store, it will be the
4 largest of its kind.
5 All of the proposals include commercial —
6 all of the proposed commercial ventures, whether it be
7 the film theater, food sales, retail sales, tour
8 center, have been provided over the last 20 years plus
9 by the National Park Service informal partners private
10 enterprise.
11 I'd like to state as a first core member of
12 the Friends of the National Park, I concur with the
13 position and comments we presented to the
14 Superintendent on May 22, 1996. Two of those are:
15 We are comfortable with the concept of profit for a
16 private developer business from their use of the
17 National Battlefield, and we do not want an NPS
18 facility to inure to any private benefit.
19 As a constant at every meeting, there
20 should be no commercialization of this park.
21 MS. ANSTY: Thank you, Ms. Myers.
22 MS. MYERS: May I say one final thing?
23 MS. ANSTY: Yes.
24 MS. MYERS I would like to summarize by
25 stating that since the GMP truly only offers two

## COMMENTS

45

1 alternatives, one, no action, which is unacceptable,
2 or two, the Kinsley proposal, which I believe is not
3 acceptable, I, therefore, believe the only true
4 alternative is to reject the plan.
5 MS. ANSTY: Thank you.
6 Eric Uberman.
7 MR. UBERMAN: U-b-e-r-m-a-n. Although the
8 draft Management Plan has three action alternatives,
9 each alternative is the same when it comes to the
10 Kinsley visitor center, its location, its size, and
11 its commercial aspects. No choice is given. In fact,
12 the Park Service has predetermined without
a 13 alternatives the most controversial aspect of the
14 General Management Plan. The Park Service has taken
15 the hard work of others within the park system for the
16 General Management Plan and made them vulnerable to
17 the Kinsley no alternative proposal. It is for this
18 as well as many other aspects within the General
19 Management Plan that the draft General Management Plan
20 in its current form should not be accepted.
21 Misinformation, confusion, the play on
22 words, semantics, if you will, delays, information
23 released only through the Freedom of Information Act
24 requests are all the hallmark of this General
25 Management Plan and are in and of themselves reason

## RESPONSES

### Eric Uberman

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the draft GMP/EIS (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

1 enough that this plan not be accepted.

2 We ask why the National Park Service in

3 Washington trusts the original commercial partner

4 Kinsley and the Gettysburg National Military Park

5 after the scandalous arrangement they originally tried

6 to foist on the public here. Can the National Park

7 Service in Washington, D.C., trust the Gettysburg

8 National Military Park to protect the national

9 interest of Gettysburg after its disgraceful

10 performance thus far?

11 Why does the Gettysburg National Military

12 Park turn a deaf ear to our elected officials — to

13 our elected Congressional leaders, the media,

14 citizens, Civil War organizations, local elected

15 officials, and others in the clear refrain of no

16 commercial facilities in the park? Why is there no

17 alternative to the Kinsley visitor center aspect

18 within the General Management Plan? Is the Gettysburg

19 National Military Park listening? Does the National

20 Park Service in Washington care?

21 We are also presenting for formal record

22 various letters, documents, newspaper articles, all of

23 which have to do directly with the General Management

24 Plan and its process. These documents should be made

25 part of the permanent record of this General

COMMENTS

RESPONSES

47

1 Management Plan as the park has assured us. We enter
2 for the record and also for the appendix of the
3 General Management Plan the August 3, 1998 letter of
4 Senator Specter to Secretary Babbitt asking for an
5 extension of the public review period; the August 4,
6 1998 letter of Congressman Goodling asking for an
7 extension of the public review period; a September 23
8 letter to Secretary Babbitt from Senators Jeffords,
9 Lott and Torricelli; the September 25 letter to the
10 above senators thanking them for pointing out that in
11 the National Park Service's own management policies,
12 that it states very clearly that if adequate
13 facilities exist or can feasibly be developed by a
14 private enterprise to serve the park's visitors' needs
15 for commercial services outside the park boundaries —
16 MS. ANSTY: Mr. Uberman, your time is up.
17 Do you want to summarize.
18 MR. UBERMAN: Sure. I will give you all of
19 these documents for the record. And to sum up to say
20 that I find that the way Ms. Eckert was treated was
21 reprehensible.
22 MS. ANSTY: Thank you for your comments.
23 Paul Witt.
24 MR. WITT: My name is Paul Witt. That's
25 W-i-t-t. I am a resident of Gettysburg and a

40

1 businessperson who is in the tourist industry, for
2 which I have been publicly referred to as a geek and a
3 D.A.W.G., and I have been privately referred to as a
4 parasite.
5 I don't think I have to apologize for the
6 fact that my family for 40 years has provided services
7 to the business of Gettysburg. They requested
8 specifically hotel rooms so that they may extend their
9 visit from a small two or three-hour stay in
10 Gettysburg to an overnight stay or two nights or three
11 nights or four nights. My customers are the visitors.
12 If the visitors are happy, my business will succeed
13 and will prosper. But I see very little in this plan
14 for the visitors' benefit.
15 The Park Service has referred to the visitor
16 center as intrusions under the scene. I feel this is
17 nothing that can be further from the truth. These
18 buildings are vital visitor resource information
19 centers to serve the visitors that are convenient to
20 the sites for the visitors' enjoyment and using of the
21 area.
22 I found it incredible that these sites that
23 are convenient to the Angle, to the cemetery want to
24 be removed. The parking lots that provide parking for
25 the cemetery will be removed. The parking lots that

## Paul Witt

COMMENTS

RESPONSES

49

1 provide walking access to the Angle will be removed.
2 This will do nothing more than create congestion. You
3 won't be able to walk to the vital areas. And the
4 justification for this is to — for some shuttle
5 service the Park Service wants to put in.
6 I find it distressing that the park has held
7 the artifacts hostage to these claims they have
8 negligently neglected the articles, and then they want
9 to tout these out as poster children about how they
10 should be housed better in a new facility when they
11 are not housed adequately in the facilities they
12 have.
13 Thank you very much.
14 MS. ANSTY: Thank you, Mr. Witt.
15 Betty Lee Frealing.
16 MS. FREALING: My last name is spelled
17 F-r-e-a-l-i-n-g.
18 My first concern is the people who move into
19 Gettysburg and have only been here for maybe 10 or 11
20 years or a little more. They do not have the
21 knowledge like the people who have lived here for 50
22 years or more like I have. And you can't get the love
23 of a town unless you have roots here. This is my
24 opinion. I used to take my children to the National
25 Museum and to the visitor center.

## Betty Lee Frealing

a

1 And then the other thing is, I live on Route
2 134. That will be the main road into the museum, the
3 Baltimore Pike and the Taneytown Road. My concern is
4 the traffic that there is going to be there.

b

5 And the other thing is the cutting down of
6 the trees and the wetland that they will eventually
7 take. And I feel that we have to protect the wetland
8 and our animals in order for us to survive; or else,
9 we will be on the bottom end of the totem pole.

10 Thank you.

11 MS. ANSTY: Mrs. Beverly Stanton.

12 MS. STANTON: My name is Dr. Beverly Ann
13 Stanton, resident of this county, my family since the
14 beginning of the town.

15 I and the other part of James Getty's direct
16 descendants conversed about this at the end of August,
17 the group that comes to town, the white part of the
18 James Getty family. And Mrs. Ray, a person 54 years
19 old, also interested in environmental issues — it is
20 amazing how genes pass things down — she said, Pass
21 it on to them what you have been trying to do is for
22 protecting this the way the citizens who were here
23 when this war happened. It was the black citizens of
24 this town who were not allowed to fight locally as one
25 of the local gentleman was who had to go with the

a The traffic analysis suggests that the average daily volume on Taneytown Road would decrease over current conditions. This is because the museum complex would include access from both Baltimore Pike and from Taneytown Road. The analysis completed by the traffic consultant indicates that traffic would likely use both roads to enter or exit the museum complex. The current visitor centers are located on Taneytown Road, and NPS now directs all traffic from State Route 15 to use Taneytown Road. Under the action alternatives, traffic from the north would now be directed to use Baltimore Pike. This would result in reduced traffic on Taneytown Road.

b The draft GMP/EIS alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that were considered in the draft GMP/EIS. The non-removal of trees favor forest species, most of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting any federal or state listed threatened or endangered species. Wetlands would be maintained in areas where trees were removed.

The process by which trees may be removed would vary depending on the site. Best management practices would be applied to all sites to minimize the impact of tree removal on the park and its resources. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. This would have minimal impact on most species because most of the wooded area would be retained. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available to open those areas and maintain them, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas. Cutting during the winter when the ground is frozen would reduce soil erosion and sedimentation in the streams while also not affecting species during their breeding seasons. Seeding and the planting of native plants as soon as possible after the cutting would also reduce erosion and help prevent the establishment of non-native species.

## COMMENTS

51

1 Massachusetts regimens, who had to bury the southern
2 and the northern people for one cent a day in that
3 National Cemetery because the white citizens
4 considered it too stinking and disgusting a job after
5 bodies had lain for days in the hot sun of July.
6 Now we are talking about taking down trees.
7 I want you to know, those of you concerned about that,
8 that this is what control in an agency does. I was
9 included in all those General Management Plan
10 meetings. In the very first meeting they had, which
11 was overly stocked with Civil War reenactor
12 enthusiasts, and there is nothing wrong with that,
13 there were only three of us that brought up and talked
14 about the trees. It did not even make it into the
15 plan other than that there might be a negative impact.
16 When you control things such as are done in
17 this meeting with no chance to respond — I want you
18 to know, I was on a Congressional staff. There is
19 such a thing called a filibuster in Congress where a
20 Congressman from a district that has a big thing he
21 wants to do, such as he wants to put a dam in his
22 area, he can filibuster. He can talk all night if he
23 wants. So, as they go down the roll call of the
24 senators, they say, I yield to the distinguished
25 gentleman, Senator Baker, from the State of Tennessee.

## RESPONSES

### Beverly Ann Stanton

1 And then that individual continues talking. They call
2 the next senator. I yield. There is no reason why in
3 a government that we have for the people, by the
4 people and in a town that my family has founded that
5 I — you know, we call ourselves Americans. And I am
6 a Black American with Native American and white
7 heritage. And the way this whole thing has happened,
8 tearing down trees at a time we're talking about an
9 ozone layer that has grown, at a time that two weeks
10 ago in the State of Pennsylvania it says that finally
11 we have turned around 100 years of declining greenery
12 in our state, at a time that we are concerned about
13 water, this all started with Bob Monahan and, again,
14 woods, a stand of woods that's been back before the
15 Civil War, right where they want to put this same
16 museum.
17 Every Saturday and Sunday — if you don't
18 believe me, come to our house on Taneytown Road and
19 sit. Every Saturday and Sunday, there's reenactors
20 shooting off cannons that make your windows shake. If
21 this is a small parochial thing — you have to live
22 it.
23 What I'm talking about is, I want your
24 children and grandchildren to be able to walk. And
25 when it gets hot in July, I want them to be able to

## COMMENTS

53

1 get underneath a tree. I have not been very
2 vociferous against putting a museum on the original
3 Fantasyland site. That's what I told Bob Monahan.
4 That's what I told John Latschar. Why do we have to
5 take other ground that's been that way since before my
6 people got here, when Native Americans were probably
7 here? Why do we have to go put up another building
8 for people in 75 years to get in a room and talk about
9 that should never have been put on hallowed ground?
10 MS. ANSTY: Thank you, Dr. Stanton.
11 MS. STANTON: Thank you very much.
12 MS. ANSTY: I think we are going to take a
13 15-minute break now. Thank you.
14 (Recess taken from 8:30 p.m. to 8:45 p.m.)
15 MS. ANSTY: We'd like to get started again.
16 I'd like to call Holly Giles.
17 MS. GILES: My name is Holly Giles,
18 G-i-l-e-s. I am the vice president of the Gettysburg
19 Borough Council and the chair of the National Park
20 Service and Borough Ad Hoc Committee that has been
21 working on and studying this problem for all the 60
22 days that we have been entitled to.
23 I actually came here thinking this was going
24 to be a question and answer period. So, my only
25 comment at this point would be that the borough

## RESPONSES

### Holly Giles

1 council is coming to a decision on October 13 when all
2 nine of us meet together. And in our democracy,
3 that's the way we work. For those people who think
4 that we are a small town and we have waited too long
5 to step up and speak or we haven't been impassioned
6 enough, I would suggest to you all that we have worked
7 long and hard at this process. We are elected to
8 represent the 7,000 residents of the Borough of
9 Historic Gettysburg and we fully intend to take all of
10 their considerations into our position paper, which we
11 will get to you by the 17th.
12 Thank you very much.
13 MS. ANSTY: Thank you.
14 Bill Leonard.
15 MR. LEONARD: L-e-o-n-a-r-d.
16 MS. ANSTY: Leonard.
17 MR. LEONARD: My name is Bill. I live in
18 Adams County. I am retired. Before I retired, I
19 spent 35 years in the transportation industry. I have
20 been all over the world. I can tell you there is
21 very, very, very few places that I haven't been. And
22 I tell people that I am from Gettysburg if they don't
23 know where I am from. Almost the whole world knows
24 Gettysburg.
25 I have been to several meetings and I have

## Bill Leonard

## COMMENTS

55

1 listened to the people. Some of them are businessmen.
2 Some of them are ecologists. I have listened to the
3 Park Service. And I can tell you it just breaks my
4 heart to hear what's going on. This place is a place
5 that there is none other in the whole world. I don't
6 believe that this place is being served by the present
7 war that's going on. And I think that the Department
8 of the Interior should look at this, and I think they
9 should listen to the people who have come to your
10 meetings. It is my opinion that the decision has been
11 made. It is my opinion that the decision was made
12 before there ever was a meeting.
13 I respectfully request a major review.
14 Thank you.
15 MS. ANSTY: Thank you.
16 Bob Monahan.
17 MR. MONAHAN: For the record, my name is
18 Robert Monahan, Jr., a lifelong resident of
19 Gettysburg. I have sat here and I have looked around
20 the audience and I have listened to the comments both
21 at this meeting and many others. The first question
22 that pops out at me is, Martha, where have you been.
23 There has been much discussion. But to cut
24 to the quick, since we're limited once again in our
25 remarks, I look around the room and there are a lot of

## RESPONSES

### Robert Monahan, Jr.

1 people with a lot of opinions, but the main opinion is
2 that something is fundamentally wrong. It has divided
3 some friendships and it has caused some anxiety among
4 people.
5 And I have had people come up to me, Park
6 Service employees, and there are a lot of fine
7 individuals that work for the National Park Service,
8 battlefield guides, historians, preservationists,
9 community leaders, they have all talked about what is
10 going on here at Gettysburg.
11 And just for the record, I am the one who in
12 very detailed fashion laid out what public/private
13 ventures are to Superintendent Latschar.
14 I have sat here and I have listened and
15 there are a lot of things that are about to come out.
16 And I wish you in this room realized what is taking
17 place in Washington, what is taking place below the
18 surface. There will be documents provided to you for
19 the record. And there will be things forthcoming in
20 the next several weeks that I think will be real eye
21 opening to you. But tonight, let me simply say two
22 things.
23 Number one, based on the way that this plan
24 has been handled, this plan should be rejected and it
25 should be done, redone in full cooperation with the

| COMMENTS | RESPONSES |
|---|---|
| 57<br>1 borough, Straban Township, Cumberland Township, the<br>2 county, and the municipalities that are affected.<br>3 That's number one.<br>4 Number two, I am absolutely shocked at the<br>5 treatment that Mrs. Eckert received this evening,<br>6 given her commitment to this community, her family's<br>7 commitment, and what she has done for the National<br>8 Park.<br>9 Number three, and I don't say this lightly,<br>10 I have thought about this, but I feel that strongly<br>11 because of the things that I am aware of that many of<br>12 you are not and eventually you will find out, but I<br>13 believe that the Superintendent here has not<br>14 discharged his duties responsibly. I think this<br>15 administration has lied, misrepresented, and<br>16 misinformed the American public and the people of this<br>17 community, and I think that the Superintendent for the<br>18 National Military Park at Gettysburg should be<br>19 removed.<br>20 Thank you.<br>21 MS. ANSTY: Jean Swartz.<br>22 MS. SWARTZ: Hi. My name is Jean Swartz,<br>23 S-w-a-r-t-z. And I have presented you a copy of the<br>24 letter that I sent to the Superintendent earlier.<br>25 I too was under the misunderstanding that we | **Jean Swartz** |

would have a question and answer period.

I thank the opportunity to participate in this. And in good faith, I did attend previous meetings and represented what I felt were the views of my particular visitor user group. And this user group, we may not be a priority as listed in the plan, and I think perhaps we need to address that, but my interest is in the trail system.

I think that the trail system is a valuable resource. As some of the others, I am very concerned about nature. I am not proud to admit that in school I did not study my history. I am not proud to admit that living just south of the Mason-Dixon line, I spent most of my time ignoring Gettysburg. But I do want to tell you that you did succeed in your job in educating me, because as a trail user, when I became involved in the bridle maintenance, I started learning in spite of myself. And I became excited about it and I want to learn more. And I thank the park for allowing this opportunity.

The master plan has described erosion. And I understand your concern. And I also, as a naturalist, would be concerned about that. However, I think since the park began using volunteers and cooperating with them, and particularly the Gettysburg

## COMMENTS

59

1 Equestrian Historical Society, that allowed other user
2 groups that had tried to volunteer their services in
3 the past an avenue to get in and donate money and
4 man-hours to help achieve an all-weather trail system
5 in areas to prevent erosion. And I believe that these
6 resources will be available to you in the future if
7 you take advantage of them.
8 My concern is that when I read the plan —
9 and I admit, I am not well educated in the system —
10 but I didn't understand some of the definitions and
11 certain resources and modern trails, what you were
12 actually thinking of as the definition as opposed to
13 what I thought you meant. So, I'd like some clearing
14 up of that.
15 And in past meetings, I asked for a
16 clarification of the map of the proposed trail
17 system. I was really disappointed to see after
a 18 attending all those meetings and being so excited and
19 participating that there was this tiny little asterisk
20 and it said, Details to be figured out later. I felt
21 like, well, what happened.
22 And I understand that you have so many
23 different interests and whatnot, but I really would
24 encourage you in the final draft to address and be
25 inclusive in this interest. And I really think that

## RESPONSES

a The GMP is used to set forth a basic management philosophy for the Gettysburg National Military Park and provide a framework for future decision-making. This plan is only the first step in the process that would lead to a final design plan with specific locations for the proposed horse trails. Site specifics are normally not dealt with at this stage of the process. There are several additional planning steps that park management would need to take before final decisions are made for horse trail routes. Throughout the process park managers would involve the public to ensure horse trails are located to protect park resources and benefit park visitors.

60

1 it is a resource that you should investigate, because
2 I understand that the roads are very congested. And I
3 don't learn well driving my car and standing in a
4 group of people. I don't experience Gettysburg. I
5 have a different way of learning. I learn when I am
6 back in the trees and I am going up this hill and I
7 think of that poor courier that was running up and
8 down that big old hill during this whole thing
9 carrying messages. And I walk across that open field
10 and I think how long it's taken me to get across
11 there. I can't imagine cannons firing. And all of a
12 sudden, I am getting there and I am learning. And I
13 would encourage you to proceed with this learning
14 project by including trails in your master plan for
15 the future.
16 Thank you.
17 MS. ANSTY: Thank you.
18 Cathy McElroy.
19 MS. McELROY: Hi. I'm Cathy McElroy from
20 Carroll County, Maryland.
21 I have spent a lot of time up here. I am
22 also a member of the Gettysburg Historical Equestrian
a 23 Society. And I support the existing bridle trails.
24 And I feel they should remain as part of the park. If
25 it weren't for the horses and the mules, the battle

## Cathy McElroy

a Chapter 2, Table 5 describes management prescriptions common to all alternatives. Non-historic trails would be removed and pedestrian and horse trails relocated to historic lanes. Horse trails would remain on the battlefield, but in different locations. Designers would develop trails that would create less damage to the resources while providing visitors with a satisfying experience.

## COMMENTS

61

would never have taken place here because they would have never gotten here. And to get a real feel of what happened here at that time, you really need to get on a horse and just take a stroll around the battlefield. It's amazing what you'll feel. All people should have the choice to choose to take a horse or a mule and ride the battlefield. And this should be available to my children, my grandchildren, my great-grandchildren.

So, we at the Gettysburg Historical Equestrian Society will certainly do our share in maintaining the trails, preserving them to try to protect this piece of history.

Thank you.

MS. ANSTY: David Sites.

MR. SITES: David Sites. I am from Gettysburg. I am here on my own behalf and, hopefully, just to get some questions answered. Unfortunately, we cannot do that.

I listened to everybody that has been in this room so far. I think everybody has excellent points. Whether you are for or against I don't think is really an issue at this point in time. I think perception is the issue.

The problem with the perception that we have

## RESPONSES

### David Sites

62

1 to date is that this has totally been orchestrated.
2 We have been led down the path. We are given the
3 guidelines. It is like coloring by the numbers in
4 second grade.
5 The other perception is that our own entity
6 here, the National Park Service at Gettysburg, is
7 above the law. They are trying to form their own
8 government form rather than be accountable as an
9 individual citizen. An example is zoning. There are
10 issues that if this project does go through, which I
11 am not saying is good, bad, or indifferent, but if the
12 project goes through at its present location, they
a 13 should have to be accountable to the same zoning, same
14 infrastructure laws, same planning laws as I am, as
15 you are. They have already requested an exception on
16 zoning based on the fact that they are a federal
17 entity. Well, either they are a private partnership
18 or they are a federal entity. You can't have both.
19 If Mr. Kinsley is doing this from a
20 philanthropic standpoint, then tell us. If he is
21 going to make money at it, then tell us. Don't just
b 22 hide behind the foundation disguise. This isn't the
23 Mardi Gras. This isn't New Orleans. Tell us up
24 front. If you are going to make a million dollars,
25 tell it to us.

a The NPS has not requested any exceptions from local zoning. Since the proposed development of the museum complex would be accomplished by a private, not-for-profit corporation, upon privately-owned lands within the boundary of the national park, the development will be subject to applicable local and state planning and zoning requirements. The Gettysburg National Battlefield Museum Foundation will be responsible for complying with all applicable regulations

b To the question regarding any potential sources of gain to the Kinsley Construction, Inc., Robert Kinsley or the Kinsley family, Mr. Kinsley has provided this response. "My proposal was to create a non-profit 501 (c) (3) foundation, the Gettysburg National Battlefield Museum Foundation, which would be the "developer" of the project. This would enable contributions to be made to the Foundation that would be tax-deductible by the donor. The Foundation would have a national board of directors comprised of representatives from the business, financial, educational, and historical communities. I hope to serve on the board of directors. The board of directors would be formed after the General Management Planning process is completed and the definitive agreement between the Park Service and the Foundation is finalized. The operation of the visitor center and museum will not result in any economic benefit to me, as all net proceeds realized by the Foundation from operations will inure to the benefit of the NPS. I will also have no financial interest in any of the entities operating within the visitor center, such as the tour companies, the film theater, the food service or any book or museum store.

"I am Chairman and Chief Executive Officer of Kinsley Construction, Inc., a regional construction contracting company that I started over thirty-five years ago. Kinsley Construction has averaged annual construction volume of $150 million over the past several years. We hope that the Foundation's board of directors will select Kinsley Construction to manage the construction of the visitor center project, however that decision ultimately will be made by the board of directors after it is formed. As construction manager, Kinsley construction would manage competitive bidding of all contracts for construction. The construction cost of the project is approximately $22 million. If the board of directors decides that it is in the best interest of the Foundation and its purposes to select Kinsley Construction to be the construction manager for the project, we envision that Kinsley Construction would be paid a construction management fee competitively priced with fees typically charged on similar

## COMMENTS

63

They are positioning themselves for nontaxation. They are positioning themselves at this point in time that if it does not cash flow, if it does not have enough cash flow resources to sustain itself after the fact, who's it going to be accountable to? In the RFP, it does not make the developer accountable. Dr. Latschar explained to me that it will be the foundation. The foundation is only as good as the resource that they are building. If that resource does not cash, they don't cash. So, who is going to pay for it? We are. Who is going to pay for the increase in infrastructure after they take the excess? We are. Where does it say that they are building in for that taxation?

The perception is that they are above the law. They are no different than us as citizens. The

c RFP should be revisited. They have not met the eight site evaluation criteria.

MS. ANSTY: Elwood Christ.

MR. CHRIST: Yes. My name is Elwood Christ. That's C-h-r-i-s-t. And the only holy thing about me is my socks. Okay.

I am speaking as a private resident of Gettysburg. I have lived in Gettysburg since February of 1980. I graduated from Gettysburg College in 1975,

## RESPONSES

construction management projects.

"To date, Kinsley Equities, a Kinsley family partnership, has provided all the seed money for this project, without any guarantee that any of it will be returned. You should also know that the Kinsley Family Foundation has donated a grant in the amount of $2 million to the Gettysburg National Battlefield Museum Foundation in order to complete the purchase of the site for the proposed museum and visitor center. To date, prior to signing an agreement with Park Service, Kinsley Equities and the Kinsley Family Foundation have provided the Gettysburg National Battlefield Museum Foundation approximately $3.5 million, to acquire the Levan site and the RV site and to fund all the studies that have been required, including wetlands, endangered species, archeological and traffic studies. That amount also includes site planning performed to date by LSC Design, Inc., an architectural and engineering company primarily owned by the Kinsley family. All other start up expenses, including costs involved in the public relations efforts and the cost of Kinsley Construction personnel devoted to the planning of the project prior to the agreement with the NPS, have been borne by Kinsley Construction and will not be reimbursed.

"After the fundraising is completed, including the establishment of a mechanism to ensure creation of an endowment for ongoing funding needs, the construction of the museum and visitor center project is complete, and operations commence successfully, it is likely that I will have considered my mission accomplished and would step aside for others to continue this good work. I will have no financial interest other than what has been explained in this letter."

This information was released to the public during the GMP planning process.

c The eight site evaluation criteria that were described in the Request for Proposals were the basis for judging all proposals that were submitted for the Visitor Center and Museum Facilities. The evaluation committee assessed all proposals against these criteria and their assessment is a matter of public record. The proposal submitted by Mr. Robert Kinsley, principal of Kinsley Equities and Kinsley Construction, Inc. (the Gettysburg National Battlefield Museum Foundation) was selected for negotiation because it successfully addressed all eight site evaluation criteria.

64

1 majoring in physics, of all things. And in 1995, I
2 received a master's in American Studies from Penn
3 State Harrisburg.
4 I would like to comment on the concept of
5 the visitor center. Does the Park Service or do the
6 American people need a visitor center at Gettysburg?
7 I think eventually it does. Is the site appropriate?
8 Given all things, trying not to move it too far out of
9 town so the existing commercial enterprises are not
10 too adversely impacted, I would say the site is fair.
11 The problem I have is the way that the Park
12 Service plans to go about funding it. And this sort
13 of touches on what Mr. Sites just touched on. It
14 seems to me that the way it is set up right now is
15 that there is a very strong possibility, given the
16 track record of the National Park Service here at
17 Gettysburg since, let's say, the building of this
18 structure on a site where it really should not have
19 been built, the erection of the Gettysburg National
20 Tower, because of what I understand was some political
21 pull that was done behind the scenes, not to mention
22 the railroad problem we had several years ago, I am a
23 little bit hesitant about the reliability of some of
24 the people in the Park Service to do right by the
25 American taxpayer.

## Elwood Christ

## COMMENTS

## RESPONSES

65

1 Now, as I understand the situation now, the
2 developer, whether it is Kinsley or whoever, they will
3 build the structure. There will be some commercial
4 operations in there. And eventually, the National
5 Park Service will take over the property when the
6 developer has made some money or recouped his
7 investment on the property.
8 Also, Dr. Latschar has said that the
9 Congress will not give the Park Service the money to
10 build the visitor center.
11 Well, I think the present situation is that
12 the Park Service is looking at it sort of with
13 blinders on. This is the only way we can do it. What
14 we need is maybe some people, maybe some financial
15 wizards, to sit down and say, well, how can we do
16 this. And one suggestion I would have, instead of the
17 developer holding on to the property for 25 years, let
18 the developer go out, nonprofit organization, raise
19 some money, and then he invests, let's say it's $20
20 million. Okay. Let's factor in, say, a 10 percent
21 profit, which would be $22 million. And once the
22 building is completed, it will be turned over to the
23 National Park Service and the developer, whoever that
24 might be, would get a $23 million tax break. In other
25 words, he won't have to pay taxes. He has a $23

1 million tax break. In essence, you're spending
2 government tax dollars that haven't been collected.
3 That's how you get it built. That's how I think.
4 Thank you.
5 MS. ANSTY: Thank you.
6 Craig Stark.
7 MR. STARK: My name is Craig Stark. That's
8 S-t-a-r-k. And I am a familiar face to most of the
9 people here. And the reason for that is that I became
10 a spokesperson for people of dissent.
11 Four years ago this month, the National Park
12 Service under the same environmental policy act that
13 compels this meeting to be tonight, when they proposed
14 that they needed to clear the battlefield of deer,
15 that provoked a lot of concern for a lot of people,
16 literally thousands of people. Some people here in
17 the community took it upon themselves to conduct
18 research. Upon their research, they concluded that if
19 they would remove some of the historic woodlots that
20 were nonhistoric, that they would return the crop
21 fields to the 1863 setting, that the deer would move
22 off, that a substantial number of those deer would
23 leave the battlefields. In fact, we have come — it
24 fell on deaf ears, this process. None of this was
25 taken into consideration. We were unceremoniously

## Craig Stark

## COMMENTS

67

1 dismissed for that suggestion. We were left without
2 any other alternative but to bring a lawsuit.
3 Through the process of that lawsuit, we have
4 discovered about 12 feet of documentation. Among that
5 documentation is a 1994 report from Bobbie Platt. She
6 was a member of the Advisory Commission. And in her
7 September, 1994 report, she concluded that they needed
8 to remove — or rather, return the agricultural fields
9 to the same crops. And I am going to quote from her
10 report that, "It is reasonable to expect that much of
11 the current deer population would move to areas
12 outside of the park where more desirable food sources
a 13 are available." This same individual when it came
14 time to vote on this deer reduction act fell silent.
15 In fact, she resorted to calling people of dissenting
16 voices who were raising objections over the next
17 precedent program that's being developed here at
18 Gettysburg. D.A.W.G.s I believe was the term.
19 I think this is very disturbing, and I think
20 that it does go to the — it speaks to the distrust
21 that this administration has demonstrated in the first
22 precedent program for the Department of the Interior
23 for their agencywide environmental problem with
24 wildlife. They are having an economic problem
25 agencywide. And so, they inappropriately are using

## RESPONSES

a Your information is incorrect. Ms. Platt voted against the implementation of the White-tailed Deer Management Plan at the January 12, 1995 meeting of the Gettysburg National Military Park Advisory Commission.

1 Gettysburg as the proving ground to ramrod through
2 what is, in effect, the beginning of the privatization
3 of the National Park Service.
4 We were not opposed to killing deer. We
5 were not opposed to reasonably restoring some of the
6 woodlots. And we fully support returning the
7 agricultural setting to 1863. But the way that this
8 is being done is deceitful and it is undermining the
9 trust that the people of the United States have with
10 the bureaucrats who are currently serving at this
11 unit.
12 Thank you.
13 MS. ANSTY: Thank you, Mr. Stark.
14 MR. STARK: I'd like to present this for the
15 record.
16 MS. ANSTY: Sure.
17 MR. STARK: It is the deer lawsuit. I'd
18 like it to be incorporated into the General Management
19 Plan.
20 MS. ANSTY: Okay. Why don't you bring it
21 over.
22 MR. STARK: I want it incorporated into the
23 plan in its entirety, if I may.
24 MS. ANSTY: Thank you.
25 MR. STARK: Thank you.

## COMMENTS

69

1 MS. ANSTY: Emmett Patterson.

2 MR. PATTERSON: I probably need to spell my

3 first name. Last name is easy. It's E-m-m-e-t-t,

4 P-a-t-t-e-r-s-o-n.

5 MS. ANSTY: Okay.

6 MR. PATTERSON: I am, unfortunately, the

7 owner of the McDonald's here in town, according to

8 some people. But before I go on, for the people who

9 think this is about the number of Big Macs you can

10 sell, it really shows that you don't understand the

11 issue here. You really don't understand if you think

12 I am concerned about selling a lot of Big Macs. Just

13 in case you don't know, I paid my note off in June.

14 So, we'll be fine.

15 With that being said, I am also the father

16 of six children. So, if you want to pull out the

17 American flag, the Park Service, I take my children to

18 the park at least once a month and I still get tears

19 in my eyes when I stand up there and think of the

20 numbers of men that were killed there.

21 So, I think, as a group, let's stop trying

22 to be who's the better American, because I think we

23 are all good Americans. Let's resolve the issues in

24 front of us.

25 And with that being said, I am looking at

## RESPONSES

### Emmett Patterson

1 the General Management Plan, on Page 8, "Mission
2 Goal 4: Partnership and Cooperative Actions." What I
3 am requesting, and I'd like this on the record, is you
4 have partnerships already. If you look on Page 8 and
5 Page 9 of this report, it talks about how important
6 the private partnerships have been to the park. And I
7 don't think anyone is going to argue that — it lists
8 all the private partnerships. Some of them are the
9 Advisory Commission, the Eastern National, the
10 licensed battlefield guides, Friends of the Park, site
11 volunteers, Civil War Roundtables, municipal and
12 regional governments. And down below, it keeps going
13 and listing, and it says, "Local Tourism Agencies and
14 Businesses."
15 You know, we are all good Americans, folks.
16 We need to find common ground. But this plan has
17 ripped us apart. It's a shame because we all want to
18 do what's right.
19 There is not a single businessperson here
20 that knows we cannot move forward. We have to do
21 something to move forward. We all realize that. We
22 are not stupid.
23 You have the partnerships. What I am
24 saying, you probably have an implied legal contract,
25 too. And you can't walk away from these partners the

## COMMENTS

71

1 way you'd possibly like to. The reason I am saying
2 that is if you've read the Tom Martin report, the
3 economic impact report, it is flawed. And I will
4 challenge anyone that hasn't read it to read it,
5 because it's not right. And if you can find the
6 backup information that supports it, it doesn't exist.
a 7 All you have to do is go through the Freedom of
8 Information Act, which we won't have time to do
9 because we are out of time.
10 So, my formal request is, why is there an
11 artificial 60 days? If this is such a great plan and
12 it's right, why are we artificially holding it for 60
13 days to really take a look at it? Because one of the
14 things you can't do, you can't operate in a void,
15 which goes back to the issue that this park happens to
16 be in a community called Gettysburg. 49 percent of
17 the properties in Gettysburg only pay taxes. You have
18 got to be careful with what you do with Gettysburg.
19 Gettysburg has to support, for example, a 7,000 person
20 town, 14 policemen. An average town this size has
21 four policemen. What are you doing to the economics
22 of Gettysburg? And that's the caution I want to give
23 you guys. You have to be careful what you're doing.
24 And I am not sure that this plan is thorough enough.
25 I don't think the Thomas Martin plan is thorough

## RESPONSES

a The Economic Impact Evaluation, prepared by the Office of Thomas J. Martin, was released to the public on August 17, 1998, at the same time the draft GMP/EIS was released. Copies of the report were distributed to interested individuals during a detailed presentation on the findings of the report at public workshop on September 10, 1998. Copies were provided upon request to any interested individual throughout the comment period and are still available from the park.

72

1 enough to really show the economic impact.

2 Thank you.

3 MS. ANSTY: Thank you very much.

4 Dave Radcliffe.

5 MR. RADCLIFFE: My name is David Radcliffe.

6 It's R-a-d-c-l-i-f-f-e. I am speaking on behalf of

7 the Gettysburg Equestrian Historical Society.

8 Dr. Latschar, we would like to take this

9 opportunity to thank you and your staff for the past

10 years of well organized and important discussion in

11 the proposals of the GMP.

12 The Gettysburg Historical Society's main

13 role is to assist the park in maintenance and

14 continued use of the horse trails. We would request

15 the society please be included in discussion regarding

16 said horse trails, changes, and consideration versus

17 historical and recreational trails.

18 Most important is the belief that those who

19 use the park should get something back. Something in

20 our case is the man and woman power of our society to

21 maintain the working use of the trails. Building

22 projects such as new bridges and other resources we

23 offer financial and funding through horse shows and

24 guided trails.

25 In short, we would like to please take —

## David Radcliffe

## COMMENTS

73

please use the direction of the GMP. And thank you for your support.

MS. ANSTY: Thank you.

Elise Scharf Fox.

MS. FOX: My name is Elise Scharf Fox. That's E-l-i-s-e, S-c-h-a-r-f, Fox, F-o-x. I am speaking as a private citizen of this area. I was born and raised here.

As a citizen, I would like to express my apology to Angela Eckert for the treatment that she and her attorney were afforded.

I agree with Dr. Stanton that in any Congressional hearing, the attorney would have been able to continue when Mrs. Eckert gave her time up.

I am also very concerned with the rudeness that has been displayed by the Superintendent to all of us at these meetings. You have just looked at me now, Dr. Latschar. That's the first time that I have seen you make eye contact with anyone this evening.

There is a play called 1776 that was about the founding of this country. And one of the lines in it was, "Is anybody there? Does anybody care?" We, the citizens of this territory here, care. No one is listening from the Park Service.

I heard on the Today Show just the other day

## RESPONSES

### Elise Scharf Fox

74

1 some people talking from the Park Services out in the
2 west. And some businesspeople said we're good enough
3 for the Park Service as long as we are doing what they
4 want. When they are finished with us, that's it.
5 I have no economic or political axe to
6 grind. I love this area. And I think that you are
7 doing wrong. You, I am afraid, have decided this is a
8 fait accompli. And it is very frustrating to think
9 that all of us who care are here and speaking out and
10 taking our valuable time when does anybody care, is
11 anybody there.
12 Thank you.
13 MS. ANSTY: John Bostek.
14 MR. BOSTEK: Good evening. My name is John
15 Bostek. I am from Fairfield. My last name is spelled
16 B-o-s-t-e-k.
17 Three things I would like to speak about
18 this evening. First of all, I am opposed to any
19 changes in the park as it is currently today. I feel
20 that the changes would bring about, first of all, an
21 attempt at revision of history.
22 Secondly, I am opposed to the
a 23 commercialization of any National Park, especially
24 this one.
b 25 And third, I feel that the changes would

## John Bostek

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

b The description of the proposed partnership in the draft GMP/EIS (pp. 97-99), and the Letter of Intent between the NPS and the Gettysburg National Battlefield Museum Foundation (pp. 326-39), state that all programs and operations within the new museum complex would be conducted either directly by the NPS or by one of its partners. All partnership programs and operations would be subject to the review, approval, and oversite of the NPS.

## COMMENTS

75

1 bring about a lack of accountability since the program
2 would basically be handed over to private interest.
3 I recently moved to the area a year ago. I
4 first vacationed in this area in 1982. My wife and I
5 fell in love with it. We have had horses all of our
6 lives. One of our dreams was to move here some day
7 and be able to ride our horses on the battlefield.
8 And as I said, I just moved here last year. And here,
9 I am learning that the horse trails are about to be
10 changed and closed after we have only had the
11 opportunity to enjoy them a couple of times. I would
12 like to look forward to enjoying them more in the
13 future and seeing other people enjoy them as well, as
14 well as future generations.
15 Thank you for your time.
16 MS. ANSTY: Thank you very much, Mr.
17 Bostek.
18 We are at this time concluding. We will be
19 continuing this meeting on Saturday at 2:00 in the
20 same place.
21 MR. UBERMAN: Point of order. Point of
22 order.
23 MS. ANSTY: We went through all the sign-up
24 sheets.
25 MS. STANTON: I have something more to say.

c

## RESPONSES

c All three alternatives recommend that the horse trails be relocated to historic lanes where resource damage would be greatly reduced. Only after the new trails are designed and constructed would the existing trails be closed.

1 Just two minutes I need. We have time. We are
2 scheduled to 10:00. We are here. That's not right.
3 MS. ANSTY: We are concluded for the
4 evening.
5 MR. UBERMAN: Point of order.
6 MS. STANTON: And if we were talking and
7 it's 10:00, you would cut us off. So, if people have
8 some comments to make, I think they need to be heard.
9 MALE VOICE: The meeting is scheduled until
10 10:00. Why didn't you give everybody four minutes
11 instead of three minutes?
12 MR. CABA: What's the legal precedence for
13 ending it early?
14 MS. ANSTY: Anybody who would like to have
15 anything further to say, please, I need your name.
16 So, you can refill out a form. We can have an
17 additional two minutes. Okay. Or unless you have
18 already spoken and you want two more minutes, just
19 tell me who you are.
20 Would Thomas Wolf like to speak again? I am
21 just going to go through every person.
22 MR. CABA: And we can relinquish time, yield
23 time?
24 MS. ANSTY: No, we are not going to do that.
25 MR. CABA: What's the legal precedence for

## COMMENTS

77

1 not doing that when we had previously done that at
2 other meetings?
3 MS. ANSTY: Sal Prezioso.
4 MR. PREZIOSO: I'll pass.
5 MS. ANSTY: You'll pass. Okay. Linda
6 Bugash.
7 (No response.)
8 MS. ANSTY: Gerald Bennett.
9 (No response.)
10 MS. ANSTY: John Fenstermacher.
11 MR. FENSTERMACHER: Thank you very much. I
12 will repeat a couple of things. The NPS put out
13 artifacts in the display that showed decay, but failed
14 to tell you they were in the same deteriorated
15 condition when they were donated to we, the people.
16 The trashing of our National Park at
17 Gettysburg by its administrator of the National Park
18 Service must stop. You, your families, and the
19 Rosensteel families have worked too long and too hard
20 to let this bureaucracy destroy our heritage.
21 I would like to read the letter again from
22 Angela to Dr. Latschar.
23 "I write to you on behalf of the Rosensteel
24 family. We are most troubled by the National Park
25 Service's efforts to remove 'The Rosensteel

## RESPONSES

### John Fenstermacher

1 Collection' from the premises owned by the National
2 Park Service to a property owned by a private
3 developer on sacred ground that should not be further
4 disturbed.
5 "Our gift was made to the people of the
6 United States to be maintained for the country's
7 education and enjoyment in facilities owned by the
8 United States in Gettysburg. By your own admission,
9 you and the National Park Service have permitted the
a 10 collection to deteriorate and, in some cases, be
11 destroyed or stolen. Clearly, this does not meet the
12 conditions of the gift nor meet any reasonable
13 standards of historic preservation.
14 "Your failure to accept private or public
15 donations, such as Eastern National to help preserve
16 the collection is unexplainable. Yet, you claim you
17 have no money to properly maintain the collection.
18 "Accordingly, we believe the spirit and
19 intent of the gift from the Rosensteel family have
20 been violated by the NPS's failure to properly care
21 for the artifacts; and it is our intent to revoke the
22 gift because of these willful violations and to ask
23 the Justice Department to investigate the supervision
24 of the gifts by the NPS. It is obvious that we, as
25 private citizens, can maintain the collection better

a In 1971, when the Rosensteel Family sold the building that houses the current park Visitor Center and its grounds to NPS for $2,3 million, they also donated the Rosensteel collection to NPS, without restriction or reservation of any kind. The Office of Solicitor of the U.S. Department of the Interior has reviewed the deed of gift and confirmed that it clearly conveys the collection without restrictions. Since 1993 (the year that the first professionally trained curator arrived at Gettysburg National Military Park), NPS has invested $703,500 in improving conditions in the museum collection at the park. Unfortunately, the inadequate size of the current storage facility and its lack of adequate temperature, humidity or dust controls prevent NPS from addressing the most serious preservation problems facing the collections. The provision of appropriate, climate controlled and secure storage space is one of the major goals of this GMP/EIS.

1 than the NPS. We can no longer trust the National
2 Park Service with our national treasures.
3 "Very truly yours, Angela Rosensteel
4 Eckert."
5 Thank you.
6 MS. ANSTY: Angela Eckert. I am just going
7 in order. Angela Eckert.
8 MRS. ECKERT: No. I was refused a while
9 ago, so I am not going to talk at all. So, tell the
10 man next to you.
11 MS. ANSTY: Craig Caba.
12 MR. CABA: Yes. My name is Craig Caba. I
13 am a little bit appalled in regards to the time
14 limitations. And I would like to also set for the
15 record that the precedence of previously was nothing
16 like we see right here. There were some meetings that
17 had questions and answers. And now, of course, we
18 have this great limitation. I'd like to know where
19 your office is precisely, because I shall be there
20 tomorrow and I'd like to see what your definition is
21 of the hearing, of public meeting, of workshop, et
22 cetera. I am sure the government with all their
23 bureaucratic genius, of course, have these things
24 written down. And I'd like to see how this meeting
25 complies with the regulations of the National Park

## Craig Caba

1 Service and the Department of the Interior. Would you
2 please give that to me after the meeting.
3 MS. ANSTY: Sure.
4 MR. CABA: Thank you.
5 MS. ANSTY: Chris Madrid.
6 (No response.)
7 MS. ANSTY: Philip Stewart.
8 (No response.)
9 MS. ANSTY: Elizabeth Daniels.
10 (No response.)
11 MS. ANSTY: Margaret Blough.
12 MS. BLOUGH: I would simply thank you for
13 trying to maintain some order and not permitting this
14 to be turned into a filibuster by any party, no matter
15 how laudatory their motives are or at least are
16 claimed to be.
17 MS. ANSTY: Michael Lyons.
18 (No response.)
19 MS. ANSTY: Bill Stephens.
20 (No response.)
21 MS. ANSTY: Dan Hoffman.
22 (No response.)
23 MS. ANSTY: Roger Steele.
24 (No response.)
25 MS. ANSTY: Conrad Richter.

## Margaret Blough

## COMMENTS

81

(No response.)

MS. ANSTY: Elaine Jones.

(No response.)

MS. ANSTY: William Jones.

(No response.)

MS. ANSTY: Hank Whitfield.

(No response.)

MS. ANSTY: Gene Albright.

MR. ALBRIGHT: Gene Albright, A-l-b-r-i-g-h-t. Just a few comments that I would like to have had time to say before.

Local fruit growers as well as environmentalists are well aware that the plans to install 150 new acres of new orchards are commendable, but in no way compensate for cutting forests. Those who disagree are the same ilk who would claim that a cornfield is a fair replacement for prairie vegetation on the Great Plains.

a Only a small fraction of the visitors to Gettysburg are interested in serious historical matters. The majority, and my source is personal observation of National Park Service ranger friends, the majority who visit appreciate the scenic beauty, the chance to observe nature, to relish a certain rural charm, and especially to reflect on the meaning

## RESPONSES

### Gene Albright

a The 1995 Visitor Services Project referenced in Section 3.2.2, pp. 182-183 of the draft GMP/EIS, established that 88% of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96% toured the battlefield. The experience of the professional interpretive staff at GNMP, in its daily contact with the public, supports the findings that a majority of park visitors are interested in history.

82

1 of peace as opposed to waging war.

2 So, I support Alternative A, which is to do

3 nothing, as the wisest course of action we could take.

4 Thank you.

5 MS. ANSTY: Margaret Counts.

6 (No response.)

7 MS. ANSTY: Michael McCloskey.

8 (No response.)

9 MS. ANSTY: Tammy Myers.

10 (No response.)

11 MS. ANSTY: Eric Uberman.

12 MR. UBERMAN: Thank you. Citizen after

13 citizen stood before you and they asked you questions.

14 Many of these citizens tonight thought that they would

15 receive answers from you. Clearly, they did not. You

16 had no intention of giving anyone any answers tonight.

17 And that was clear.

18 When we spoke, and I speak of the solicitor,

19 at the break, I asked you if you would be kind enough

20 to explain to the citizens how their questions would

21 be responded to, in what form, in what manner, and

22 when. People who already left the building have no

23 clue, none. The answer could be made they should have

24 attended some other workshops, but not everybody

25 attended every single workshop.

## Eric Uberman

83

1 To the representatives of Congressman
2 Goodling, the representatives of Senator Santorum, I
3 clearly hope that you got the flavor, the feel, the
4 taste of what transpired here this evening. This is
5 not an isolated incident. This is something that has
6 been going on in this park for the last three years.
7 We are not just a small group of citizens who are
8 disturbed or heretics, greedy people, if you will, but
9 citizens who want to be heard, questions that want to
10 be asked, and no answers are ever given. If the
11 answers are given, the answers are given in ways that
12 misrepresent the truth.
13 We ask your assistance. We can only ask
14 your assistance at this point. We ask your
15 assistance.
16 Thank you.
17 MS. ANSTY: Paul Witt.
18 MR. WITT: My name is Paul Witt, W-i-t-t.
19 And I will be very brief. There's just an issue that
20 I need to bring up. There's a lot of us in the travel
21 industry that are concerned about what the — not what
a 22 the historian feels about, but what the average
23 visitor feels about when they come to Gettysburg, just
24 to pay the taxes when they come to town, understand
25 the story. And it seems like the National Park

## Paul Witt

a NPS believes that most visitors come to Gettysburg to understand its history. The 1995 Visitor Services Project referenced in Section 3.2.2, pp. 182-183 of the draft GMP/EIS, established that 88% of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96% toured the battlefield. The experience of the professional interpretive staff at GNMP, in its daily contact with the public, supports the findings that a majority of park visitors are interested in history.

## Beverly Ann Stanton



1 Service is more interested in the one percent of the
2 visitors, vis-a-vis the historians, who look at the
3 visitor center as being an appalling structure, et
4 cetera, et cetera. A lot of us are just looking out
5 for what the vast majority of the visitors feel.
6 Thank you.
7 MS. ANSTY: Betty Frealing.
8 (No response.)
9 MS. ANSTY: Dr. Beverly Stanton.
10 MS. STANTON: Two comments. One with regard
11 to — Stanton, S-t-a-n-t-o-n. No relation, I don't
12 think, to the director, but we are not too sure. He
13 is from Texas. Maybe I will give him a call and see
14 if he's a cousin. Okay.
15 With regard to the transportation, and I am
16 one of those people, I don't really have a problem
17 with trams in, et cetera, but putting that center
18 where you want to put it instead of at the original
19 Fantasyland site means a lot of walking for a lot of
20 people, because people really don't want to ride
21 buses. Look at America's transportation, commuter
22 problems. People don't want to ride trains. They
23 don't want to ride buses. They want to be in their
24 car. So, these people that are now walking the
25 Taneytown Road on Saturday and Sunday, walking their

1 kids all over the place, you've got to keep weaving in
2 and out to keep from hitting them. They don't know
3 where they can cross, if they can cross. They are now
4 going to be coming up my avenue and doing this same
5 stuff. It is not an adequate system, especially since
6 you're closing down the thing.
7 But I am going to talk about dissenters.
8 You know, this nation and this world is better off
9 because of people like me. You know, it's the people
10 that get along to get along, who sat around and let
11 all those Jewish persons be killed over in Russia.
12 It's the people in the United States who weren't
13 pro-slavery, but they really didn't want to rock any
14 boats with their friends and associates that had 26
15 million of my people trucked from other places and
16 treated in the most horrendous ways. And we still
17 haven't gotten over some of that stuff.
18 Patrick Henry talked about give me liberty
19 or give me death. These people that did this
20 Constitution were dissenters. These were the people
21 that stood up and said, no, we are not paying taxes to
22 England, no, we are not doing this, no, we are not
23 doing that. The only good thing that happens to get
24 bad done is for good people to do nothing. And they
25 are going to get their museum. But, as I said from

86

1 the beginning, it's going to be responsive to the
2 local community. It is going to take into granted
3 nature. Make sure there are some animals that can
4 live at the same time. And I think when we get to be
5 a hundred and we are getting ready to die, all of us
6 in the room, we won't care so much about whether there
7 was extra footage in the cafeteria, but we will care
8 if we feel we left this land a little bit better.
9 I believe in the Native American saying that
10 back in 1855, some guy wrote to the President and
11 said, Look, you all might live now, but if you don't
12 take care of the trees, the grass, your families, your
13 old people, the white man will pay the day and you
14 won't have clean water to drink and you won't have
15 clean air to breathe.
16 Thank you.
17 MS. ANSTY: Thank you.
18 Molly Giles.
19 MS. GILES: No thank you.
20 MS. ANSTY: Bill Leonard.
21 MR. LEONARD: Again, I have listened. I
22 know you're not answering questions tonight, but may I
23 ask you, are you a parliamentarian? What are your
24 qualifications for conducting this meeting? I hope
25 that isn't insulting. No comment?

## Bill Leonard

## COMMENTS

87

1 MS. ANSTY: I am an attorney with the Office
2 of the Solicitor at the U.S. Department of the
3 Interior. I am located in Boston, Massachusetts.
4 MR. LEONARD: I think this meeting was just
5 getting close to being bad.
6 MS. ANSTY: Bob Monahan.
7 (No response.)
8 MS. ANSTY: Jean Swartz.
9 (No response.)
10 MS. ANSTY: Cathy McElroy.
11 (No response.)
12 MS. ANSTY: David Sites.
13 (No response.)
14 MS. ANSTY: Elwood Christ.
15 (No response.)
16 MS. ANSTY: Craig Stark.
17 MR. STARK: I also have a question for you.
18 After reviewing the General Management Plan on
19 September 15, I had major questions. And on the 18th
20 of September, I submitted a request to the park. And
21 it's my understanding that the Department of the
22 Interior solicitor in Boston, Mr. Conte, has
23 determined that — is making a determination. Can you
24 apprise me as to whether or not that information is
25 going to be turned over prior to the end of the

## RESPONSES

### Craig Stark

1 comment period so it can be taken into an analysis of
2 both myself as well as a number of other interested
3 parties in the room?
4 MS. ANSTY: I am not the attorney who is
5 handling that case. You should ask Mr. Conte.
6 MR. STARK: Dr. Latschar, can you respond to
7 that? Will that information be released?
8 MS. ANSTY: I think you should ask Mr.
9 Conte.
10 MR. STARK: I want to say for the record
11 that Congressman Goodling has that information and
12 indicated to me in correspondence he was requesting
13 it. However, at last check, the park has not been
14 requested by the Congressman. So, there seems to be a
15 discrepancy there.
16 I also have one other comment. I believe
17 that Abraham Lincoln has been attributed to saying
18 that those who cannot remember the past do not have
19 much of a future.
20 And I think that the incumbent regime or
21 administration has miscalculated the indigenous
22 resistance because they failed to take into account
23 that it was the people of this community who
24 established this park. And the people of this
25 community have cared for this park. It first went to

## COMMENTS

89

1 the stewardship of the Commonwealth and it stayed
2 there until 1895, I believe, Doctor, when it was
3 transferred to the United States Department of War,
4 who did a very admirable job of the stewardship until
5 1933 when it was turned over to the Department of the
6 Interior. It has been deteriorating systematically
7 ever since. And due to gross mismanagement, now you
8 are acting in crisis mode. You're implementing crisis
9 management tactics without declaring an emergency.
10 Thank you.
11 MS. ANSTY: Thank you.
12 Emmett Patterson.
13 MR. PATTERSON: I want to refer back to the
14 General Management Plan, on Page 18. I think this
15 needs to be noted. It is "Issues Related to Mission
16 Goal 4: Partnerships." And I just highlighted one
17 sentence. There is more to it, but the one sentence I
18 think is critical, "The fate of these small
19 communities is tied to that of the park and the
20 actions taken by the National Park Service." And it
21 also states, "The park nearly surrounds the Borough of
22 Gettysburg, comprises a large part of Cumberland
23 Township, and touches at least five other townships
24 around the Park." The key word, the fate of the small
25 community, Gettysburg.

## RESPONSES

### Emmett Patterson

1 Impacts to be considered in analyzing the
2 plan. One of those is socioeconomic environment.
3 That means the people who live here.
4 Then if you keep going, over on Page 22 —
5 excuse me, on Page 20, it says — it was actually on
6 Page 19. It says, "Impacts to be considered in
7 analyzing the plan," and it continues going. Then it
8 says, "Impact topics eliminated from further
9 evaluation," which is on Page 22 under socially or
10 economically disadvantaged populations, and I
11 highlighted this, "Social effects on minority or low
12 income communities." If you ever take the time to
13 drive behind my restaurant and take a look at the
14 low-income areas behind my restaurant, is there a
15 study, is there anything done to check what's going to
16 happen to those people? If there isn't, I think we
17 need to go back and look at that. That's why I have a
18 problem with the Tom Martin report. Yes, for a
19 selfish reason, I am looking at McDonald's. However,
20 I am looking at the Borough of Gettysburg, also. Go
21 by those homes and tell me they are not low income,
22 which I think we need to look at what's going to
23 impact — or how it's going to be impacted. I did not
24 see that in the Tom Martin report.
25 Thank you.

a Pursuant to the *Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis*, published by the U.S. Environmental Protection Agency in April, 1998, no socially or economically disadvantaged populations exist within the study area. In any event, none of the alternatives would result in disproportionately high and adverse environmental effects, including human health, economic and social effects, on minority or low-income communities. There are no air or water pollution impacts that would impact human health. Economic impacts from employment, associated earnings, and construction because of the action alternatives are expected to be positive. There would be no effect on types or character of land in the surrounding area that could affect minority or low income communities. This issue is discussed on page 22 of the draft GMP/EIS.

## COMMENTS

91

1 MS. ANSTY: David Radoliffe.
2 (No response.)
3 MS. ANSTY: Elise Scharf Fox.
4 MS. FOX: There is one thing that I am
5 concerned about, and I think that the relics, the
6 artifacts that the Park Service is saying and
7 exhibiting as in deteriorating condition, I am
8 wondering — another gentleman brought up about a
9 simple humidifier or dehumidifier. Could this be a
10 public relations ploy to show these artifacts? I
11 don't know about the others in the audience, but I
12 wouldn't give the Park Service any historical valuable
13 property because you have not shown good stewardship.
14 I am also concerned that there has not been
15 that much said about what you're going to do with the
16 traffic on the Baltimore Pike and the Taneytown Road.
17 Where is it going to go?
18 Thank you.
19 MS. ANSTY: John Bostek.
20 (No response.)
21 MS. ANSTY: Is there anyone else here who
22 would like to comment who has either already done so
23 or has not done so and would like to talk? When you
24 get here, could you give us your name.
25 MR. POWELL: For the record, my name is Dr.

a

## RESPONSES

### Elise Scharf Fox

a The environmental controls within the collections storage area of the current Visitor Center are practically non-existent. There is neither heat nor air conditioning in the vast majority of the 6,000 square feet of storage space, which makes the temperature control for artifact preservation impossible. The entire 6,000 square feet area lacks humidity control, which makes it impossible to protect the artifacts from wide fluctuations in relative humidity. Finally, there is no air circulation system in the storage area. None of these problems can be solved in isolation. For example, the lack of temperature control is a major factor leading towards wide fluctuations in humidity. Likewise, it is impossible to provide heating and air conditioning (temperature control) without installing an air circulation system for the entire storage area. In 1988, the NPS estimated that the cost of correcting these basic environmental storage problems would be over $1.6 million (not including funds required to address any of the other storage deficiencies, such as lack of adequate storage space.)

The use of portable dehumidifiers would have a negligible effect upon these area-wide environmental deficiencies.

92

1 Walter Powell, P-o-w-e-l-l. I am a resident of
2 Straban Township, Adams County. Citizen.
3 My comments are going to be very brief.
4 Like many others tonight, I have heard a great deal of
5 significant things said and a great deal of concern,
6 both pro and con. It takes a great deal of courage to
7 generate a plan which inevitably is going to generate
8 controversy. It wouldn't matter whether it was Dr.
9 Latschar or someone else. The fact is that clearly
10 something needs to be done here. However, I think it
11 also takes a great deal of courage to pull away from a
12 plan when it becomes apparent that a substantial part
13 of the American public has deep concerns about it.
14 I am making an appeal to Dr. Latschar and
15 the administration to take these considerations into
16 account this evening. And the honorable thing, I
17 believe, to do at this point is to lay this plan aside
18 to allow ample opportunity for further comment.
19 I am most deeply troubled about the
a 20 commercial component. I think it lacks precedent. I
21 think it is a difficult road to follow. I believe
22 that some of the merits of the plan have been
23 subverted by the very thing that has been driving it,
24 the proposal to build a new center.
25 While the concept indeed may have had merit,

## Walter Powell

a The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

| COMMENTS | RESPONSES |
| --- | --- |
| 93<br>1 I think enough flaws in the proposal have been<br>2 generated that in any planning process, at some point<br>3 we may have to step back and conclude that we may have<br>4 made a mistake and it's time to regroup and<br>5 reevaluate.<br>6 Certainly at the local level, if the<br>7 citizens of Straban Township or the Borough of<br>8 Gettysburg had this kind of opposition to planning,<br>9 almost inevitably local government would have to pull<br>10 away and reevaluate. I think the time has come to do<br>11 that with no animosity expressed one way or the<br>12 other. But I desperately, indeed, I urge you to<br>13 consider that course of action.<br>14 MS. ANSTY: Thank you, Doctor.<br>15 I saw some other hands go up.<br>16 MS. DANIELS: I am Elizabeth Daniels again.<br>17 And I remembered something that I didn't have time to<br>18 speak about before. And this, along with other things<br>19 I was talking about, had nothing to do with the change<br>20 of the visitor center, but of the original plan<br>21 itself. The park is trying to interpret several<br>22 things; one, the history of the battle and to better<br>23 show the vistas that the soldiers saw and the things<br>24 that were in the way and everything.<br>25 And another is what they call a | **Elizabeth Daniels** |

1 commemorative area. This was set up by the returning
2 veterans themselves. And it includes a lot of
3 monuments and other things. And the plan says that
4 they are going to have — let's see — delineate this
5 by mowing beside the avenues and all. I think the
6 avenues pretty much tell where this area is to be or
7 was. And so, they want to honor the veterans who set
8 up this commemorative area.
9 It seemed to me as I was reading all that,
10 it's pretty complicated to try to master the Battle of
11 Gettysburg, you know, when you're a tourist and maybe
12 came and knew nothing about it. And to have something
13 like this added as sort of an overlay on what happened
14 in the battle and what the issues were and all that,
15 it seemed to me it was just a confusing factor and
16 that it might be much better to have a display or
17 something like that in the visitor center and hand out
18 a little brochure or something so that people could
19 learn about this in some way other than when they are
20 driving around and, oh, here is the commemorative
21 area, oh, here's where the tourists came and so on.
22 So, that's an idea I had as I read the thing, that it
23 just was too much for a tourist to know.
24 MS. ANSTY: Thank you, Mrs. Daniels. Is
25 there anybody else?

## COMMENTS

95

1 MR. MURPHY: Good evening. I am John
2 Murphy, M-u-r-p-h-y. I didn't plan to speak tonight,
3 but I choose to now.
4 I have spoken at two recent public
5 meetings. I have gone to all the meetings. And
6 there's a concept that's become clear to me that I
7 want to express now. It is called the park core,
8 c-o-r-e. And in this concerned citizens' group that
9 has been getting together, we have been talking — we
10 are trying to educate ourselves as to what are the
11 issues here. We want to be fair. We want to be
12 objective. We are trying to understand how the Park
13 Service thinks. And as the first chairman of the Park
14 Advisory Commission, I feel I am too a steward of the
15 park. But I am concerned. We are going — and I
16 understand what I have learned is the Park Service has
17 a policy, a planning guide, that basically says,
18 whenever possible, you should get the commercialism
19 out of the core of a park. Every park has a core.
20 Some might be built around something called Old
21 Faithful. Others have one that evolved here.
22 Military parks, according to the National
23 Register Bulletin Number 40 says, "Military parks
24 traditionally start around the cemetery." And that's
25 what happened here. This was the core of our park,

a

## RESPONSES

### John Murphy

a The historic core area of the park is not composed of or dependent upon visitor use facilities. The historic core of the park has been identified within the draft document as that combination of unique and nationally significant resources that together make up the historic resource area. This area is composed of the contributing landscapes of the Major Battle Action Resource Area, the Soldiers' National Cemetery, and the Battlefield Commemorative Resources Area—all of which are the essence of Gettysburg NMP. The current Visitor and Cyclorama Centers have already sundered the historic core of the park. Relocating the visitor use facilities from their present (and relatively recent) sites adjacent to the national cemetery would not adversely affect the historic core of the park. In fact, their relocation to a site outside of the Major Battle Action and Battlefield Commemorative Resources Areas would enhance this historic park core. The site proposed for the new museum complex is outside of the historic park core and would fulfill NPS mission goals and planning guidelines.

1 the cemetery. And then in 1928, a private museum was
2 built. And then in 1962, the first park visitor
3 center, as we heard tonight, was built. And this kind
4 of became the core of Gettysburg, three
5 parts—cemetery, museum, and the visitor center and
6 cyclorama.
7 The Park Service policy planning guide also
8 says that you should encourage commercial zones to
9 appear on the fringe of the core, not in the core.
10 It seems now — and I am talking as a taxpayer of the
11 borough. There are only 49 percent of us that pay
12 taxes in this borough. — if you move two-thirds of
13 the core, the museum and the visitor center, to a
14 place one-half mile to the east, you'll yank the heart
15 out of the core and all the walking ambiance that
16 occurs at the core will go away.
17 The commercial zone known as Steinwehr,
18 which is, I believe, trying to upgrade itself and will
19 upgrade itself in the future, I believe will die and a
20 new commercial zone will appear along the edge of the
21 new core on the Baltimore Pike. And as a taxpayer, I
22 am very nervous about this.
23 Thank you.
24 MS. ANSTY: Thank you. Do we have any other
25 people that want to comment?

b

b Like the commentors, NPS believes it is in the best interests of the park's resources to limit additional roadside development on the Baltimore and Taneytown Pike gateways to the park. NPS, either directly or through its various partnerships, has the ability to protect through easement or acquisition the lands that lie within the park boundary and the historic district. Protection of these corridors is incorporated in the park's 1993 Land Protection Plan (LPP). The language in the draft GMP/EIS regarding the protection of Baltimore Pike has been strengthened. NPS will work with Cumberland, Mt. Joy and other townships, as it has since the completion of the LPP, to protect these corridors.

The Gettysburg National Battlefield Museum Foundation has acquired an existing and grandfathered commercial use on Baltimore Pike near the proposed new museum complex. This use will be removed and the land will remain open if any of the GMP action alternatives are implemented. NPS will continue to work with Cumberland Township as it develops its master plan to ensure that the other land near the museum complex remains residentially zoned. This issue is discussed on pages 100-105 of the draft GMP/EIS.

COMMENTS

RESPONSES



1 MR. AYRE: I would just ask a procedural
2 question. The meeting on Saturday, will it be
3 conducted in the same fashion as this evening's?
4 MS. ANSTY: I think so, yes. Yes.
5 MR. AYRE: And what will the time limit be
6 upon speakers?
7 MS. ANSTY: Well, three minutes. And if we
8 have extra time — we preset the meeting. That's
9 supposed to be two hours. So, three minutes. And if
10 we — if it is a lot of extra time, you can come back
11 and talk.
12 MR. AYRE: Okay. I understand. Subject to
13 time limitations, are individuals who spoke tonight
14 necessarily precluded from again speaking on
15 Saturday?
16 MS. ANSTY: No, they are not.
17 MR. AYRE: Thank you.
18 MS. ANSTY: Would anybody actually like to
19 come and comment?
20 MR. STARK: What would be the duration of
21 that meeting on Saturday?
22 MS. ANSTY: As I said, it is scheduled from
23 2:00 to 4:00 p.m. in the same room.
24 MS. STANTON: I will come and talk.
25 MS. ANSTY: Okay.

98

1 MR. UBERMAN: Could you please tell
2 everybody how the questions will be answered.
3 MS. ANSTY: The format will be exactly like
4 this. This is your forum to get your comments on the
5 record. And that's — and the questions are answered
6 in the final General Management Plan/Environmental
7 Impact Statement.
8 FEMALE VOICE: When is it —
9 MS. ANSTY: When is it? We don't know when
10 that's going to come out.
11 MS. DANIELS: If we have a question, like I
12 have a specific question about what's going on down
13 there on Rock Creek where there is that fencing with
14 the pipes, which I understand is supposed to delineate
a 15 this commemorative zone, and it's supposed to be
16 mowed, what do they do about that? I have got that
17 kind of a question which somebody ought to know the
18 answer to. And they won't let me ask it at these
19 things. Does anybody know the answer?
20 MS. ANSTY: Every question that you do ask
21 is eventually answered either in the GMP/EIS or
22 through correspondence with the park. I mean, that's
23 why you write a letter or —
24 MS. STANTON: Excuse me. Just one point of
25 clarification. I am really bothered by these kinds of

## Elizabeth Daniels

a The commemorative avenue fencing that is proposed for rehabilitation in Alternatives C and D differs from similar remnants that are visible today along portions of the park's boundary. During the 1930s, NPS removed miles of the original veteran-era locust post and pipe-rail fencing from the avenues. Although the locust posts were destroyed, the galvanized pipes were reused to create another form of fencing. This fencing was characterized by cast concrete posts with the pipe rails and was used to enclose the park's boundaries. The pipe fence that exists along Rock Creek is an example of this mid-1930s fence and is not one of the original avenue fences. All examples of such fencing that remain within the park were constructed between 1933-1967. With few exceptions, the original avenue fencing was not erected through woodlands (such as those at Culp's Hill and Big Round Top) but was erected to enclose formal lawn areas of the park (such as at Hancock, Reynolds, Howard, and Confederate Avenues). These fences paralleled the edges of the avenues and enclosed monumental positions and mown lawn between themselves and the avenue surface.

## COMMENTS

99

1 things. I think one of the things that as Americans,
2 we are supposed to be making it so that average
3 citizens, especially older people, can have some kind
4 of way to be able to participate in these things
5 without having to plow through a whole management plan
6 and also without a back and forth letter. It is a
7 very simple question, even if you could answer it at
8 the end of the meeting, just taking care of the lady's
9 simple question. I know you really don't want to
10 answer any questions because you really don't want
11 anybody to know what's going on. But, answer the one
12 lady's question.
13 Thank you.
14 MS. ANSTY: Can I have your name?
15 MR. PETERSON: I have been coming to these
16 meetings for a long time. I have been redundant many
17 times with what I have had to say. I just want to say
18 this, that this is the most ridiculous meeting that I
19 have been to thus far where answers — or questions
20 that people have cannot be answered until the final
21 GMP is out. Therefore, don't confuse me with the
22 facts, folks, we have already made up our mind.
23 That's exactly what they are saying. I think it's
24 unfair. And I am absolutely convinced now at this
25 point that this GMP plan that you have has to go,

## RESPONSES

### Mr. Peterson

period.

DR. LATSCHAR: I am not certain it will help, but just for clarification, we'll say the same thing that we said at all five of the public workshops two weeks ago. The public workshops, public meetings were specifically scheduled as question and answer sessions. And they were specifically scheduled to give everybody the opportunity to ask us questions so that we could clarify as best we could the intent of the General Management Plan.

Due to a whole lot of pressure from many people who are actually in the room tonight that wanted a chance to have their comments recorded for the record, we thought that we were doing a good thing in acceding to that and changing the public meetings that were originally scheduled for tonight and Saturday into public hearings. We did that at the request of many people in this room who said they wanted the opportunity to record their comments for the public record.

We are in the public review period. We have heard from 30 some people tonight who have formally given us comments. We cannot legally respond to your comments tonight because we have already received well over a hundred comments through the mail in writing,

| COMMENTS | RESPONSES |
| --- | --- |

101

and we anticipate that between now and October 17 we'll receive hundreds of more comments from the 3,800 people across the nation to whom we mailed this GMP at their request. We cannot respond to any of your individual comments concerning what you think should be changed or altered about the plan legally until we have read and analyzed every single response we get through the end of the public comment period on October 17. Between now and then, we will do our best on an individual basis to answer questions of fact and clarify the kind of questions that Mrs. Daniels had. And that's what we mean, the final response to everybody's comments, yours and everybody else's across the United States, will be the final GMP and the final Environmental Impact Statement.

And as I have said before, we plan to print every single letter we get. The transcription from tonight's meeting and Saturday's meeting will be printed. And our responses to every single comment, suggestion, and criticism will be printed in that final Environmental Impact Statement so both you and the thousands of other people across the United States who are concerned about what we are going to do here will see what everybody else's comments were and will see across the board the National Park Service's

102

1 response to those comments.

2 MS. STANTON: Clarification, Dr. Latschar.

3 DR. LATSCHAR: And that's why, in essence,

4 we changed these to public hearings, because so many

5 people asked us for the opportunity for you to put

6 your comments on the record.

7 MS. STANTON: Let me clarify. We were not

8 allowed — we did not get answers at your last

9 meeting, sir. That's the big controversy.

10 Number two, these other thousands of people

11 maybe live far away and they weren't able to give up

12 six or seven hours of their time within a particular

13 month to come here. If someone has a simple question,

14 if they drove from Washington or they drove from

15 Virginia, wherever they drive from, I think that some

16 kind of an answer could come up.

17 But I want to make it clear, we were not

18 allowed — you did not make responses at the last

19 hearing. That's the reason some of us were so PO'd

20 about the situation. So, let's not give everybody the

21 understanding that a few of us caused this problem.

22 There were no answers coming the last time, either.

23 Thank you.

24 MR. STARK: Doctor, the National

25 Environmental Policy Act requires these proceedings in

## Beverly Ann Stanton

1 order that there be meaningful dialogue of the
2 proposed action. I think that what you're stating
3 here on the record is misrepresenting the spirit of
4 that law by you not going on the record with your
5 responses.
6 We — and I can speak for the people who I
7 am immediately affiliated with — didn't cry for a
8 stenographer for our comments to be on the record. We
9 were crying for your response to be on the record
10 because of these bad experiences that you have shown
11 in the past of what you have said publicly and then
12 actions you have implemented.
13 MR. CABA: One last question. What
14 assurances can you give us that the final publication
15 won't be redacted and portions missing thereof in
16 regards to the printing of the document? Can you give
17 any assurances along those lines?
18 MS. ANSTY: No. I mean, you have seen the
19 stenographer. She's taken the whole thing.
20 MR. CABA: But a lot can go between what she
21 is doing right now and the printer's bench. I was
22 wondering if you can give any assurances as to that.
23 MS. ANSTY: To the best of my knowledge,
24 everything that has been said here and every written
25 comment that we've received here will appear in the

1 record.

2 MR. STARK: With the exception of what you

3 ceased to record earlier, Mrs. Eckert's attorney.

4 MS. ANSTY: I am leaving — we have 15 more

5 minutes. Would anybody else like to comment?

6 MR. STARK: Will that be noted in the record

7 that you ordered the record ceased?

8 MS. ANSTY: Yes. Yes, it was in the record

9 then.

10 Would anybody like to comment any further?

11 MR. FENSTERMACHER: One question.

12 MS. ANSTY: Sure. Go ahead.

13 MR. FENSTERMACHER: I presented a document.

14 It is now formally in the record?

15 MS. ANSTY: Yes. Yes. It was when you gave

16 it to us.

17 Okay. Does anybody else have any more

18 comments?

19 (No response.)

20 MS. ANSTY: Thank you. And thank you all

21 for coming.

22 (The hearing was concluded at 9:50 p.m.)

23

24

25

1 C E R T I F I C A T I O N

2

3

4 I hereby certify that the proceedings are
5 contained fully and accurately in the notes taken by
6 me on the hearing of the above cause, and that this
7 copy is a correct transcript of the same.

8

9

10 Judith A. Greenholt, RPR
11 Official Court Reporter

12 NOTARIAL SEAL
13 JUDITH A. GREENHOLT, NOTARY PUBLIC
MANCHESTER BORO., YORK COUNTY
MY COMMISSION EXPIRES MARCH 10, 2001
Member, Pennsylvania Association of Notaries

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## Public Hearing - October 3, 1998



* * *

DRAFT GENERAL MANAGEMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT

GETTYSBURG NATIONAL MILITARY PARK

GETTYSBURG, PENNSYLVANIA

* * *

TRANSCRIPT OF PROCEEDINGS
OF PUBLIC HEARING

Before: MARTHA ANSTY, ESQ., Hearing Officer
DR. JOHN A. LATSCHAR
DEBORAH A. DARDEN

Date : October 3, 1998, 2:15 p.m.

Place : Cyclorama Center
97 Taneytown Road
Gettysburg, Pennsylvania

By : Judith A. Greenholt, RPR
Reporter - Notary Public

* * *

COMMENTS | RESPONSES



PROCEEDINGS HELD SATURDAY, OCTOBER 3, 1998

* * *

MS. ANSTY: My name is Martha Ansty. I am an attorney with the U.S. Department of the Interior, Office of the Solicitor. We are here today for a public meeting on the draft General Management Plan/Environmental Impact Statement for Gettysburg National Military Park. The purpose of the meeting today is to invite the public to a fair opportunity to comment on the record on the GMP/EIS. Specifically, we would like comments on the proposed options contained in the General Management Plan.

For your information, during the course of the development of the draft General Management Plan, we have had 22 public meetings, all of which included question and answer periods. Today, we will not be answering questions. This is your opportunity to make statements on the record. If during your comments you pose questions, those questions will be answered either in the final General Management Plan or in the supporting administrative record.

This hearing is scheduled to last for two hours, which means it will probably conclude by 4:15 today. I have allotted three minutes for each comment based on the number of people who have submitted cards

1 stating that they want to comment. If we have time at
2 the end of this meeting and you want to extend your
3 comments, you will be welcome to do that. But we will
4 be concluding at 4:15 today.
5 I also want to encourage you that if you
6 feel that you need to — encourage you to write any
7 kind of comment in the form of a letter to Dr.
8 Latschar. We would like to have those comments as
9 well so that we can consider them in developing the
10 General Management Plan.
11 I also have a request from the court
12 reporter. If you are speaking from the — first of
13 all, we encourage you to speak from the microphones.
14 But if you are speaking from the audience, please
15 speak loudly, slowly, and identify yourself so that
16 she can have an opportunity to write down what you
17 are saying as well as identify who you are. And if
18 she needs to get your name or clarify something, I
19 would appreciate that if she says something to you,
20 that you listen to her and respond.
21 Thank you.
22 Today is a public hearing. It is not a
23 public meeting.
24 I would like to call Dennis Frankfort as
25 the first commenter.

| COMMENTS | RESPONSES |
| --- | --- |
| 4<br>1 MR. CABA: Excuse me, Madam Chairwoman.<br>2 Could we appropriately start this meeting with the<br>3 Pledge of Allegiance to the flag in commemoration<br>4 of the Civil War veterans and our love of American<br>5 heritage?<br>6 MS. ANSTY: No. This is a public hearing<br>7 and we'd like to get it started. Thank you, though.<br>8 Dennis Frankfort, please.<br>9 MR. STARK: I think it should be noted that<br>10 the Superintendent made that decision not to comply<br>11 with Mr. Caba's request.<br>12 Thank you.<br>13 MS. ANSTY: Duly noted. I would like to<br>14 start the meeting. Can I have a comment from Dennis<br>15 Frankfort.<br>16 MR. FRANKFORT: My name is Dennis<br>17 Frankfort. First, my apologies to Dr. Latschar, his<br>18 family, and our nation's veterans.<br>19 As noted author and Nobel Peace Prize Winner<br>20 Elie Wiesel said when he visited our town, "If you<br>21 must choose but do not and people suffer, then you<br>22 have made your choice."<br>23 I am here today because I have made a choice<br>24 not to stand by and let our national heritage suffer<br>25 while we debate issues of what is more sacred, the | **Dennis Frankfort** |

land we are on now or the land where caissons were once parked.

This issue is quickly becoming another part of the Jerry Springer society that has befallen us as Americans. It is unfortunate that headlines point out controversy instead of mediation. It is even more unfortunate that the spotlight has been turned away from the issue and onto one man.

Today's show is for all of America. The spotlight is on us and what we do here. We will set the standard. Do we want that standard to be one of heated debate that gets us nowhere or do we set a standard, for our children and for the world, that shows all that Gettysburg is a place where people with opposing opinions still find a way to work together?

I understand passion, and I understand that all sides are passionate about their opinion. I respect those opinions and I do not seek to belittle anyone's point of view, but what is the real issue here? It seems to change quite often. One day it is a perceived loss of revenue in a capital and competitive market; the next it is the care of our nation's artifacts which the Park Service wants to care for in a new climate-controlled environment.

## COMMENTS

## RESPONSES



1 The passion behind some of these issues
2 seems to go against the very thing they claim to
3 support. Instead of working with the Park Service,
4 they have worked against it and perhaps, in doing so,
5 our town.
6 In these actions, we have missed an
7 opportunity to bring a community and a nation
8 together. Just think what a town Gettysburg would be
9 if each of us, citizen, politician, businessman,
10 student, teacher, visitor, and newsman, worked
11 together.
12 If we could put aside our own gains to
13 better the whole, we would be worthy of our ancestors
14 who fought a terrible war to bring this nation
15 together.
16 I urge you, all of you, not to make the
17 mistake of perpetual circles. Let us break that
18 circle now and cast a line that will preserve this
19 park, this community, and this nation for our
20 grandchildren's grandchildren.
21 Dr. Latschar, businessmen, citizens, I
22 pledge to you my every effort to work with you, as I
23 hope our community's leaders will, to make this town
24 one that prides itself not only on its heritage, but
25 on its future as well.

7

1 Thank you.

2 MS. ANSTY: Thank you, Mr. Frankfort.

3 I'd like to call Larry Defuge.

4 MR. DEFUGE: Coming here as a private

5 citizen from Dillsburg, Pennsylvania, with a genuine

6 concern for the preservation of our heritage, I am

7 somewhat puzzled by the resistance, complaining and

8 bickering about a plan that can only enhance a

9 visitor's experience and preserve these national

10 treasures, the National Military Park and the

11 Eisenhower National Historic Site. It is obvious

12 that something must be done to preserve this

13 heritage of ours.

14 The National Parks are fortunate to have a

15 proactive Superintendent and staff with true and

16 honest vision who care about the future of the parks

17 and their artifacts. Yet, most of what I read objects

18 to the plan as well as takes personal shots at the

19 Superintendent. You would think that instead of

20 thinking of ways to stop the plan and visitor center,

21 concerned citizens and the local citizenry would be

22 thinking of ways to help and take advantage of it.

23 To the Borough of Gettysburg and the local

24 businesspeople who oppose the planned visitor

25 center, it is time to remove thine head from the sand

## Larry Defuge

COMMENTS | RESPONSES

8

and face facts. These are national parks, not local parks. They belong to all of us, not just the local residents. Perhaps you should be thinking of ways to continue to make the locale a little more visitor friendly. A new visitor center can be the starting point of something truly beneficial to all concerned and a unique opportunity for both the public and private sectors to do what is right together.

To all other concerned citizens who oppose this, if something is not done now, what can we hope to leave our descendants? I have always thought that an understanding and appreciation of the past hold the keys to the future. If we don't adequately preserve the past, what future can we hope to have?

Common sense dictates that if our own government can't find the necessary funds to care for the parks, those charged with maintaining them must look elsewhere for the funds. I honestly do not see what the big deal is about this. Maybe I am the one off base, as common sense may not apply here.

It is now time for all of you to stop complaining and bickering like schoolchildren and put your hidden agendas back into their closets, hopefully forever, and do what is right and needs to be done by helping the new plan to happen.

9

1 MS. ANSTY: Thank you, Mr. Defuge.

2 I'd like to call Mr. Craig Caba.

3 MR. CABA: I believe the previous speaker

4 was absolutely right in his remarks about all of us

5 belonging to the park. In my opinion, the draft GMP

6 has failed to address the important topic of America's

7 minority community. Only one paragraph on Page 82 out

8 of 329 pages deals with minority heritage at

9 Gettysburg. Only after ten years and an admitted

10 error by the park in its boundary study has

11 McAllisters Mill been identified as a site of

12 underground railroad activity. But what about the

13 many other sites? Not mentioned — no mention of

14 these whatsoever thus far.

15 Let's take a look at this truth in the

a 16 pudding over the years. In the 1970s, the Timbers

17 farm next to Devil's Den had that three black

18 families' house and house foundation and well

19 bulldozed with no archeological studies. Also in

20 the 1970s, the Brien house was restored, which is

21 most commendable. And it was also marked. But what

b 22 about the battle-scarred, bullet-torn wood siding

23 which was taken away? Upon various inquiries by

24 various historians, the park personnel over the

25 years said that it was mislaid or just simply lost.

## Craig Caba

a The battle-era George W. Weikert farm (later known as the Timbers farm because of its post-war ownership by James Timbers), was acquired in the spring of 1962 as part of a larger tract from the Gettysburg Battlefield Preservation Association. The site of the house "complex" was completely overgrown at the time of purchase, as is evident from photographs that were taken in the fall of 1966. In August 1970 the NPS began a project to stabilize the house ruins. It was discovered that the buildings site had been used for a number of years as a trash dumping grounds and this debris was removed by NPS along with what was termed "overcrowding vegetation." The interior of the foundation wall was backfilled to retain existing alignment of the walls. By the end of September 1970, the foundation was stabilized to six inches above grade and the walls were capped with mortar to prevent water penetration. The NPS did not bulldoze or remove the Timbers buildings sites.

b When the Brian house was restored in the early 1970s, the bullet-scarred siding was removed and placed in storage. Although the park does not yet have a consolidated architectural archive, noteworthy or exemplary architectural artifacts have been and still are retained and stored in several locations within the park. The Brian siding, still in storage, has been used for paint analysis within the past eight years. Use of the siding proved invaluable in ascertaining the color of the original whitewashed surface of the building. Its color is approximated in the gray-toned paint that is visible today on the Brian farmhouse.

## COMMENTS

10

1 In the 1982 GMP, it was indicated that there
2 was going to be programs. These have not amounted to
3 very much. A small exhibit of U.S.C. colored troops
4 was put into the visitor center in the basement level
5 in a secondary position out of the way in a corner.
6 At least an attempt was made, which is commendabale.
7 I personally have volunteered to share
8 underground railroad materials with interpretation at
9 the park. However, I was never contacted.
10 Today, I have concerns about this part of
11 Gettysburg's history and a pattern of avoidance. I
12 wonder about the mandated federal programs for
13 minorities and the contracting opportunities and
14 procedures, since the draft GMP does not mention it.
15 The 329 pages is coldly silent on this issue.
16 I also wonder about the makeup of the
17 current staff and administration. I ask myself, so
18 there need not be any reply, why is there a
19 disproportional lack of representation of black
20 Americans at Gettysburg. I further wonder why there
21 are no minority members on the advisory board. I
22 could gladly recommend a fine citizen and a doctor
23 whose family dates back to James Getty's times to fill
24 this void.
25 I am surprised that since 1982 the park

c

## RESPONSES

c A GMP is used to set forth a basic management philosophy for a park and provide a framework for future decision-making. Therefore, GMPs do not generally deal with all of the laws and mandates that NPS follows. The Civil Rights Act of 1964, as amended by the Equal Opportunity Act of 1972, the Rehabilitation Act of 1973, as amended, and by Executive Order 11478 are some of the laws and executive orders that NPS follows with reference to establishing and maintaining an affirmative employment program of equal opportunity within each federal agency. These laws require the application of this policy as an integral part of personnel management and practice in the employment, development, advancement and treatment of civilian employees of the federal government. The Federal Acquisition Regulations that mandate minority business enterprise and other similar programs apply to NPS. Since these laws, mandates and policies apply to all management plans and actions, they are not specifically noted in a park's GMP.

11

1 staff has not developed a meaningful program on the
2 Gettysburg abolition movement and the underground
3 railroad. The basic materials are only over at the
4 Adams County Historical Society.
5 The draft GMP is troublesome and should be
6 also rejected due to racial concerns. In 1998, who
7 would think in the shadow of where Abraham Lincoln
8 spoke those immortal words "All men are created equal"
9 that racial avoidance and subtle insensitivity to
10 minority heritage would be manifested by silent
11 omission in this draft Management Plan.
12 Thank you.
13 MS. ANSTY: Thank you, Mr. Caba.
14 Joan Hankey.
15 MS. HANKEY: My name is Joan Hankey,
16 H-a-n-k-e-y.
17 As an American citizen, I applaud the park's
18 General Management Plan and the new museum/visitor
19 center project, but I am outraged at all the theatrics
20 and grandstanding that have been going on.
21 What is needed, and requested by the Park, is
22 constructive criticism. What they have been getting
23 from far too many sources is the mouthing of personal
24 vendettas.
25 As an American taxpayer, I wish to point out

## Joan Hankey

| COMMENTS | RESPONSES |
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12

that the federal government paid an enormous amount 27 years ago — millions of dollars — for the current museum building. In present day dollars, i.e. at present value, the sellers received more than $20 million. And, in turn, on the 21st day of December, 1971, the museum collection was donated, quoting from the gifting document, quote, To the United States of America, and its assigns to have and to hold forever, unquote. By virtue of this donation, made without restriction, the donor reaped enormous benefit and tax avoidance.

Any of us who make an unrestricted donation have no right in years down the road to find fault with what was done with our donations. Therefore, it escapes logic, sound reasoning, and the law to think that the donor has any entitlement to get their donation back. That is universally applicable to you, to me, and to this donor of, quote, The Gun, Relic, and Artifact Collection formerly owned by the Gettysburg National Museum, Incorporated, unquote.

As a resident of Adams County, I benefit greatly — as do all residents — from the existence of this park. But I am sick and tired of all the nay-sayers, all the negative thinkers, who have only personal agendas to offer. Their objections to the

13

1 good works of the park here, and the National Park
2 Service in general, are not in the nation's best
3 interests. And certainly, all this local divisiveness
4 and contention is being laughed at by those throughout
5 America and elsewhere who are sincerely interested in
6 the Gettysburg National Military Park and
7 preservation.
8 Thank you for giving me the opportunity to
9 speak.
10 MS. ANSTY: Thank you.
11 I'd like to call Marge McConnell.
12 MS. McCONNELL: I have been excited to be
13 living in an area developing so vibrantly. The very
14 carefully thought out plan for the park has been most
15 impressive to me. John Latschar has brilliantly led
16 the National Parks at Gettysburg to look forward to a
17 bright future in partnership with not only a local
18 area, but the entire audience of the park, which is
19 worldwide. His vision, along with the national
20 support he receives, has ensured a successful future
21 for the battlefield here at Gettysburg as well as a
22 successful future for the local area. I personally
23 thank him and his staff for making my future here in
24 Gettysburg even more exciting.
25 MS. ANSTY: Thank you.

## Marge McConnell

## COMMENTS

14

1 Margaret Counts.

2 MS. COUNTS: I just want to add that I'm

3 really pleased that the General Management Plan has

4 reached the stage that it has. I want to compliment

5 the staff and you, Dr. Latschar. I am definitely in

6 favor of the General Management Plan as it is written

7 now.

8 MS. ANSTY: Thank you.

9 Vickey Monrean.

10 MS. MONREAN: Hi. My name is Vickey

11 Monrean, and I am a resident of Adams County and the

12 Borough of Gettysburg. I am also executive director

13 of the Friends of the National Parks at Gettysburg.

14 Unfortunately, I do not have a statement right now

15 ready for Friends, so I am just speaking as a private

16 citizen.

17 I would like to talk about the taking down

18 of trees and the environmental effects on the natural

19 resources for a moment. I have been an environmental

20 activist in my career, and I believe that it is wrong

21 to pit historical resources and environmental

22 resources against each other. And I don't believe

23 that the taking down of these trees does do that. I

24 don't object to the removal of this acreage.

a 25 I am concerned, however, that in the long

## RESPONSES

### Margaret Counts

15

a (cont.)

1 term what is being done here, which I think is good
2 and is a good balance, cannot be sustained. And so, I
3 would ask that in the long term these principles that
4 you have worked so hard to put forward are written in
5 some document so that we are not here in 25 years
6 arguing over this same topic again.
7 I'd also like to address the Neutra building
8 in which we stand at this moment. In the long term —
9 and by long term, I mean two to 500 years — the
10 significant insignificance of this building will not
11 be that by which we are judged. It will be what
12 happened on that land.
13 I fully support the restoration of Ziegler's
14 Grove. And I think that this building was a mistake
15 in its design and it was a mistake in its placement.
16 I fully support the visitor center plan. I
17 believe the visitor center to this area must
18 increase. I intend to try personally to encourage its
19 increase. And I think that is for the health of the
20 park in the long term and for the health of the area.
21 A new visitor center is imperative, and new exhibits
22 and new ways to interact and learn of this battle are
23 very important. And I think this is a beginning.
24 I am concerned, however, that the traffic
25 plan is not what it should be. I think that it is

## Vickey Monrean

a The General Management Plan (GMP) is a long-term planning document that will guide the park for the next 10-20 years. Following final approval of the GMP/EIS, and if they are needed, implementation plans would be written for specific actions, such as the removal of non-historic vegetation. These implementation plans would include identifying best management practices to address such questions as how to remove the vegetation in the most environmentally sensitive manner, when to do the removal so as to minimize the impacts to wildlife, soil, and water quality, to establish a timetable for the removal, and how to maintain those areas once they have been cleared. For example, in some areas, trees would only be removed around the edges of historic woodlots that have expanded their boundaries. In other areas, where larger tracts need to be cleared, a view corridor may be established first. Then as time and money becomes available, the corridors would be enlarged until the area is fully restored. No areas would be cleared unless the money and labor has been secured for the long-term maintenance of these areas.

COMMENTS

RESPONSES

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1 somewhat inadequate. And I hope to say more about
2 that personally in a letter.
3 I want it to remain that shuttle service,
4 if it is done, is accessible to families
5 and cheap enough so that a family can venture here.
6 In a broad view, I support the proposed
7 plan. I believe in the mission and the goals. And
8 my concerns center on implementation, which is where
9 I want to move to.
10 MS. ANSTY: Thank you, Ms. Monrean.
11 I'd like to call Robert Harnisch.
12 MR. HARNISCH: I will pass.
13 MS. ANSTY: I'd like to call Dennis
14 Matthews.
15 MR. MATTHEWS: My name is Dennis Matthews.
16 I am from the State of Washington.
17 Late in the morning of July 1st, 1863, Major
18 General Oliver O. Howard rode to the crest of Cemetery
19 Hill where he was confronted with a broad view, which
20 he said, "Embraced the town, the seminary, the
21 college, and all the undulating valley of open country
22 spread out between the ridges." Howard turned to an
23 aide and remarked, "This seems to be a good position."
24 The aide replied, "It is the only position, General."
25 The military significance of these heights

## Dennis Matthews

| COMMENTS | RESPONSES |
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1 with their beautiful field of fire was apparent to
2 Howard. This was the place for an army to make a
3 stand.
4 Today, the open expanse of Cemetery Hill
5 and ridge which stood out so prominently above the
6 town in 1863 is now obscured by the visitor center,
7 the cyclorama, numerous trees, and the encroachment of
8 the town itself. This obscurity is exemplified by
9 visitors who leave this building in order to go to
10 the battlefield. I would like to remind everyone
11 that that place, all of this place, is a battlefield.
12 The National Military Park is not a green
13 belt. It does not exist as a buffer against further
14 development nor as a way to protect the view from the
15 front porch.
16 The National Military Park is not a
17 wildlife refuge. It was not established to protect
18 squirrels or birds or deer or wetlands.
19 The National Military Park is not an
20 arboretum. It is not meant to be a pastoral retreat
21 from hectic city life.
22 The National Military Park is not a horse
23 park, nor is it an architectural museum.
24 The National Military Park is not a
25 business. It should not compete commercially with the

COMMENTS

RESPONSES



1 local townspeople.

2 The National Military Park is a battlefield.

3 The battlefield itself is the most important artifact

4 of the battle we have, and it is the Park Service's

5 mission to preserve and protect this artifact.

6 I favor radical restoration of the

7 battlefield without the privatization and

8 commercialization of the park.

9 I'd ask those who oppose restoration to the

10 historical landscape of 1863 and the removal of the

11 trees, please, do not use the straw man argument that

12 restoration implies the removal of the commemorative

13 monuments. I find this line of argument offensive and

14 disingenuous. These memorials were set up by the men

15 who fought here to honor their fallen comrades and to

16 remind all of us of the cause for which they fought.

17 It was here, in this place, that this nation

18 made a stand. It is our duty and responsibility as a

19 nation to preserve it.

20 Apparently, and sadly, we no longer have the

21 political will to meet our responsibilities. The

22 National Park Service cannot maintain the battlefield,

23 the memorials, and the artifacts at the current

24 funding level. Will this be our generation's

25 contribution to this place? Are we to turn this

19

1 hallowed ground into something it is not?

2 I am dismayed and saddened by the acrimony I

3 have witnessed in these meetings. I urge the National

4 Park Service to find another means of financing this

5 project, one that does not threaten the local

6 community. And I urge the citizens of the borough to

7 remember why this park is here.

8 Thank you.

9 MS. ANSTY: Thank you, Mr. Matthews.

10 I'd like to call Barbara Finfrock.

11 MS. FINFROCK: I am Barbara Finfrock. I am

12 a homeowner and a taxpayer in Adams County. I am also

13 the vice-president of the Friends of the National

14 Park. I will be helping to formulate the comments and

15 statement for that organization. I am speaking

16 strictly from a personal point of view today.

17 Thank you for this hearing and the

18 opportunity to have my comments become part of the

19 official record, and thank you also for the many

20 public meetings and workshops where I had been able to

21 ask questions and receive information concerning the

22 park's plans for the next several years.

23 I am particularly interested in the

24 education and historical accuracy of things concerned

25 with the Civil War, its causes, its actions, its

## Barbara Finfrock

1 people, its results. These things are our
2 responsibilities to pass on to those who visit this
3 extraordinary place which, through an accident of
4 fate, happens to be located in zip code 17325. The
5 interpretive themes which are contained in the draft
6 GMP are excellent and will go far to clarify myths
7 about the American Civil War, once we have a more
8 satisfactory place for the dedicated park staff to
9 add exhibits of explanation.
10 I want to note with appreciation that the
11 park is making a special effort to ensure that social
12 perspectives of the American Civil War become a
13 greater part of the exhibited and interpreted visitor
14 experience. There will need to be many new types of
15 exhibits in the proposed new museum and visitor
16 center, not just guns and bullets. Reenactors and
17 collectors of artifacts will continue to reenact and
18 collect as they should, but those among them who are
19 also serious students of American history are
20 applauding the interpretive direction of the park as
21 expressed in the draft GMP.
22 All citizens who read the mission and goals
23 stated in the GMP should be proud to be part of this
24 process. Those who choose to disregard the mission
25 and goals but rather put forward their own personal

1 thoughts and feelings fail to accept the fact that
2 this is not a private park, but a national treasure.
3 The desire to make significant changes to the
4 landscape, the woodlots, the museum and visitor center
5 should not be viewed through our personal eyes, but as
6 privileged citizens in the proximity of a place
7 historically important Where people eat when they
8 visit Gettysburg is not a national issue, but why
9 people came here as part of a great struggle of wills
10 is a national issue to be understood and taught over
11 and over to all generations.
12 I would also like to applaud the park's
13 planning for people-moving in times of greatest park
14 population. There will always be the opportunity of
15 walking, if one wishes to walk, the opportunity to
16 drive one's own vehicle if one chooses to drive; but
17 to help alleviate overcrowded conditions at certain
18 times, the planned choices of transportation and even
19 of alternate routes should be a welcome aid to
20 visitors and help with their enjoyment of the park.
21 Thank you again for this opportunity to be
22 part of the park's planning and overall guidance for
23 future management decisions. And thanks very much to
24 the Superintendent and his staff for their care and
25 patience.

COMMENTS

RESPONSES

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1 MS. ANSTY: Thank you, Mrs. Finfrock.

2 I'd like to call Dean Shultz.

3 MR. SHULTZ: I'd want to first state that I

4 am submitting six pages of written comments into the

5 record, and that these comments, I want to say, are my

6 personal opinion, not of any agency or organization

7 which I represent.

8 The Gettysburg GMP plan is a well prepared

9 document and it was easy to follow. I have to

10 congratulate you on that.

11 The park's historical landscape study of

12 past and present landscape features and

13 characteristics is applauded. The maps are accurate

14 and well done. The information was long needed and is

15 an indispensable source of future planning.

16 The concept of recognizing both the 1863

17 landscape and the battlefield commemorative period as

18 two separate identities is a great step toward keeping

19 the Gettysburg National Military Park in its

20 historical perspective.

21 The need for the improvements to the visitor

22 center, museum, cyclorama, and staff and maintenance

23 facilities are recognized.

24 I broke this report down into many

25 classifications. The first is mission goals, land and

## Dean Shultz

1 resources.

2 The main concern I have in mission goals,

3 land and resources, is I question the amount of money

4 which is being estimated to be the cost needed for the

5 maintenance of all these new improvements.

a 6 And I also question if the construction of

7 all the new fences and the reestablishing all the

8 farmlands and so forth, although it may be probably of

9 very historical significance, if by doing this it will

10 eliminate the farming program to such an extent that

11 it will put a tremendous burden on the park for future

12 maintenance of the park.

b 13 When woodlots are being removed, I hope

14 there is consideration given to allowing buffering to

15 be remained and retained between the new modern

16 development and the woodlots that are there now. I am

17 sure visitors would sooner look at a woodlot than a

18 new modern development.

19 With respect to the transportation study,

20 the existing parking lots now at the cyclorama and the

21 visitor center are one of my concerns. I consider the

22 existing parking lot at the cyclorama a very well

23 designed, laid out parking lot. You cannot see

c 24 vehicles in it from any portion of the park. One of

25 my concerns is that by removing these parking lots, we

a In preparation for the draft GMP/EIS, park historians researched field sizes at the time of the battle and compared them to field sizes of today. The Warren Survey (1868-1869) shows field sizes ranging from 1.5 acres to 39 acres with an average size of 12.35 acres. Information obtained from the Adams County Farm Service Agency and 1990 aerial photos indicate field sizes of farms surrounding the Gettysburg battlefield ranging from 1.1 acres to 100 acres with the average field size of 16 acres. The farms of today are farmed with modern equipment and field sizes ranging from 10-20 acres do not prohibit them from using their equipment. Historic field sizes were similar to modern field sizes, so returning the battlefield to smaller field sizes should have only a minimal effect on the modern farmer.

The amount of land in the agriculture program would not change dramatically with the implementation of any of the action alternatives. The open farmland that is currently being farmed would continue to be farmed. In addition, some areas that are currently wooded and were historically in crops or pasture would be cleared. This land would then be put back into the agriculture program and would increase the amount of land farmed and should therefore result in a stable farm income.

b NPS intends to remove nonhistoric vegetation where it obscures significant battle topography or historic views (fields of fire). Although there is the possibility that some modern development may thereby be revealed that is currently obscured, most of this vegetation would be in the central portions of the park. Certain hedgerows or tree screens along the park's boundary may be removed in order to enhance visitor understanding of the key terrain and fields of fire, thereby exposing adjacent development. Opening key views would enhance the visitor's capability of understanding the evolution of the battle and the significance of terrain, movements, and command decisions. Curtains of vegetation that closed such views and that minimized the significance of certain portions of the battlefield have often negated that capability. It is NPS' desire to restore, wherever possible, the key historic and significant views that determined the outcome of the battle.

## COMMENTS

24

1 will not have parking for the visitors who wish to see
2 the Angle and the Gettysburg Military Park Cemetery.
3 On preservation, I see a great need — am I
4 going over my time?
5 MS. ANSTY: Why don't you wrap it up.
6 You've got —
7 MR. SHULTZ: I will go to the conclusion.
8 Conclusion. The Gettysburg National
9 Military Park should more fully address how and when
10 many of the proposed actions are to be accomplished.
11 Although there have been many verbal comments made by
d 12 the park staff during the workshops and meetings,
13 unless these specifics are included in the plan, the
14 person reading the plan will not have a clear
15 understanding of how these actions are intended to be
16 instrumented. A clear and detailed outline for
e 17 financing and implementing these actions is
18 necessary. They information is also necessary to
19 assure that future park staff, who may not be involved
20 in the preparation of the GMP, have the necessary
21 information and guidance to administrate the plan.
22 Many times the GMP —
23 MS. ANSTY: Thank you, Mr. Shultz.
24 MR. SHULTZ: Am I over?
25 MS. ANSTY: You're over.

## RESPONSES

c Some of these concerns are addressed on page 90 of the draft GMP/EIS. It discusses restoration of the original alignment of Hancock Avenue near the Taneytown Road entrance to the Soldiers' National Cemetery. Traffic flow here would be one-way northbound with additional parking on the entire right shoulder of the avenue. The draft GMP/EIS also discussed the potential for an alternate transportation system (page 93) to move visitors from the proposed museum complex to the most highly visited sites, including the Cemetery and the Angle. The draft GMP/EIS does not indicate a specific location for parking for the Cemetery and the Angle, but NPS would develop a parking area to provide access to these sites. Its exact size and location would be based upon recommendations of engineering and design consultants. Pedestrian access would be considered during the design of the parking lot.

d The purpose of a GMP is to define the basic philosophy of park management and provide broad guidance to park managers who make hundreds of decisions each year that can affect a park's resources and its visitors. A GMP sets direction for resource protection and visitor use in consultation with the public, and NPS adopts its findings and uses them to guide the management of a park for 10 to 20 years. Typically, site-specific details and recommendations are not included in the GMP alternatives, since the GMP is intended to provide a framework for more detailed management decisions. A more detailed implementation plan would be prepared once this action has been funded.

e As noted above, the purpose of the GMP is to define the basic philosophy of park management and provide broad guidance to park managers. A GMP sets direction for resource protection and visitor use actions required to accomplish the park's mission. Park managers use these broad prescriptions to guide the hundreds of smaller decisions that are made over the 10 to 20-year life of the plan. Since availability of specific sources of funds over this time period cannot be predicted, the GMP establishes the goals; it then becomes the responsibility of park managers to seek funds and other assistance from all appropriate sources in order to accomplish those goals. As in the past, the park would continue to emphasize the critical role of volunteers, donations, and grants and funds from outside sources as a means of accomplishing the GMP's objectives.

## Paul Witt

25

1 Paul Witt.

2 MR. WITT: My name is Paul Witt, W-i-t-t.

3 I am from Gettysburg. I am a supporter of the park.

4 I know John Latschar is probably saying, with friends

5 like me, who needs enemies. But, I do support the

6 park and their mission to preserve the park, to care

7 for the park. I realize the park, as the other

8 speaker stated, is not an arboretum, and it is not a

9 game preserve. But, it is possible to do the right

10 thing for the wrong reasons. And I personally would

11 like to see the new visitor center, see more

12 exhibits. I think it would be great for the

13 visitors.

14 It is kind of hard to defend the park when

15 they complain about deer eating the park land and deer

16 must be removed and the park is saying, well, now we

17 must remove the woods because they are in the way.

18 The park seems to have recognized a lot of

19 problems they want to provide solutions for and they

20 seem to only have what they consider one solution.

21 The solution for the deteriorating artifacts must be

22 a new facility. If the cyclorama roof leaks, the

23 cyclorama building must be torn down.

24 The Department of the Interior and the

25 National Park Service have regulations against

## COMMENTS

26

1 commercialism in the parks. I think this is being
2 ignored. The General Management Plans must be made
3 to provide a wide range of options. I don't feel
a 4 this is being done. There are basically two
5 options—one, no option alternative, and the other
6 three options are essentially all the same.
7 Also, the General Management Plans by law
8 may not justify decisions already made. I think the
9 visitor center proposal, which is a keystone of the
10 plan, is one that has already been made.
11 Thank you.
12 MS. ANSTY: Thank you, Mr. Witt.
13 I'd like to call Tammy Myers.
14 MS. MYERS: My name is Tammy Myers. That's
15 M-y-e-r-s. I am a businessperson and resident with an
16 interest in the preservation and interpretation of our
17 park. Therefore, I believe I have a broad level of
18 interest in the success of the Gettysburg National
19 Military Park and the General Management Plan.
20 My hope is one that will result in a
21 balanced consideration of all stakeholder groups.
22 Therefore, I have attended every meeting held publicly
23 by the National Park Service for the last three and a
24 half years. And it's been a lot more than 22 meetings
25 that you spoke about.

## RESPONSES

### Tammy Myers

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new General Management Plan/Environmental Impact Statement (GMP/EIS) to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the GMP (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

# COMMENTS

27

1 Over those years, I have gained a better
2 understanding of the park's needs, wishes, and
3 desires. Simply put, the park needs better curatorial
4 storage and archive facilities. The park wishes to
5 have a new museum and visitor center. And the park
6 desires to restore the landscapes.
7 This observation became apparent after
8 touring the present facilities, learning of the
9 park's rejection to Eastern National's offer to build
a 10 curatorial storage facilities to prevent further
11 deterioration of the artifacts — and the park, it is
12 my understanding, declined that because it only met
13 one of the goals — and by the development of the
14 museum and visitor center's proposal prior to the
15 implementation of the General Management planning
16 process. Clearly, all stakeholders, including
17 residents, visitors, preservationists, businesses,
18 would like to see the museum and visitor center
19 improved either by upgrading, renovating, or
20 constructing a new facility. Unfortunately, the
21 plan does not call for the other alternatives.
22 What the plan does provide is two options,
b 23 no action or the Kinsley proposal within the General
24 Management Plan. There is no choice in the site, the
25 size, the scale, or the scope of the project.

# RESPONSES

a The concept of building stand-alone storage space for the artifact and archival collection was considered by the park in the 1996 draft Development Concept Plan/Environmental Assessment for Collections Storage, Visitor & Museum Facilities. However, since an isolated storage facility would satisfy only one of the park's four major goals (see p. 8), it was not the park's preferred alternative. There was never a formal offer from Eastern National to build such a storage facility for the park.

b Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

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- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

28

1 Is the status quo acceptable? Absolutely
2 not. Is the predetermined Kinsley proposal
3 acceptable? Absolutely not.
4 Therefore, my recommendation is that the
5 draft General Management Plan with the present
6 setting, public/private partnership, be rejected and a
7 new plan be developed integrating all options and
8 alternatives.
9 Thank you.
10 MS. ANSTY: Thank you, Ms. Myers.
11 I'd like to call Sam Dayhoff.
12 MR. DAYHOFF: Thank you. I have been
13 farming and renting a pasture from the Park Service
14 for the past 12 years. But being involved with the
15 General Management Plan representing the farmers, I
16 will have to say that the plan is not most favorable
17 to the permittee.
18 However, that is not the Park Service's main
19 mission, which is to preserve the 1863 appearance. I
20 would just like to state that this plan will eliminate
21 areas of farm ground and will increase maintenance
22 costs of the Park Service.
23 But I am generally in favor of the General
24 Management Plan Alternative C. It helps the park to
25 succeed in its mission without preferential treatment

## Sam Dayhoff

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

1 to any one entity.

2 And with that, I'd like to congratulate the

3 Park Service on their decisions. As I found out being

4 in public service, it seems like when you piss off all

5 sides, you have done a good job and you have had the

6 right answers.

7 Thank you.

8 MS. ANSTY: Thank you, Mr. Dayhoff.

9 John Fitzpatrick.

10 MR. FITZPATRICK: Thank you, Dr. Latschar

11 and members of the legal staff of the Department of

12 the Interior and my fellow citizens, for the

13 opportunity to speak.

14 My name is John Fitzpatrick. I reside in

15 California where I have for the last 13 years. But as

16 a young college student and someone who was born and

17 raised in Philadelphia, I was president of the

18 Villanova University Student History Club and led our

19 field trip here in 1963, the centennial year of the

20 battle. And I have been drawn to this place ever

21 since.

22 I'd like to make three brief points,

23 procedural and substantive. I am an attorney. I am

24 a member of the California bar. I have maintained my

25 membership in the bar of the Commonwealth of

## John Fitzpatrick

1 Pennsylvania. But I am speaking personally here.

2 As an attorney, I know something about the

3 Administrative Procedures Act, the law which governs

4 this process. And my summary and this comment is that

5 the park gets very high marks for following the law.

6 They only had to have one hearing. We have heard they

7 had at least 22 and maybe more than that.

8 We heard the other night — and this is the

9 first time I've been here and heard this small

10 vociferous group of objectors, because all I have been

11 able to do in California is read this (Indicating).

12 And to hear that there was no opportunity for Q and A,

13 yet in all the workshops there was opportunity for Q

14 and A, leads me to believe there is a hidden agenda

15 and disingenuousness going on. There were 22

16 workshops, four hearings, a comment period that still

17 exists. All written comments will be considered by

18 the park and have to be answered on the public record

19 for every one of you that make a comment. They get

20 very high marks for following the law.

21 Substantively, I prefer Option D. I support

22 what you're doing. General Meade, when he was made

23 commander of the army on June 28, wanted to fight the

24 Battle of Pipe Creek. From the Confederate point of

25 view, there was a terrible breakdown in communication

31

1 between General Lee and General Stuart. This battle
2 happened largely by accident. But, ladies and
3 gentlemen, it happened here. It is a national
4 treasure. We need to preserve what happened here.
5 And lastly, my last substantive comment is a
6 representative comment. I am a member of the
7 Tri-Valley Civil War Roundtable in Dublin,
8 California. We have between 40 and 50 members. We
9 reviewed this plan. I am here to tell you that all of
10 the members unanimously support Option C.
11 Thank you.
12 MS. ANSTY: Thank you, Mr. Fitzpatrick.
13 I'd like to call Norma Calhoun.
14 MS. CALHOUN: I'll make my comments in
15 writing. Thank you.
16 MS. ANSTY: Thank you.
17 I'd like to call C. K. Roulette.
18 MR. ROULETTE: Thank you. My name is C. K.
19 Roulette. I am a local resident of Cumberland
20 Township. And although I am associated with several
21 local organizations involved with land and historic
22 preservation, the opinions I am expressing are my own
23 and not representative of any of those organizations.
24 First, I agree that new and expanded
25 facilities are absolutely necessary for greeting and

## C. K. Roulette

a Between August 1995 and April 1996, NPS prepared a *Draft Development Concept Plan/Environmental Assessment* (DCP) to explore alternatives for the needed facilities. Development Concept Plans are tools that NPS uses to solve facility concerns. The DCP included four alternative concepts for the new facilities: (a) a no action alternative, (b) building a collections and archival storage facility and leaving the Cyclorama and visitor centers as they are; (c) building a new Cyclorama building combined with collections and archival storage and renovating the existing visitor center in place, and (d) building a new combined facility incorporating all these uses. The DCP was put out for public review for 45 days in April 1996. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues. The majority of the public comments which were received agreed with the NPS' choice of Alternative D, building a new combined facility in a new location.

b The plan alternatives range from the removal of no trees to the removal of 1015 acres of trees. All four alternatives have environmental consequences that are considered in the draft GMP/EIS. The no-action alternative, in which no trees are removed, favors forest species, many of which are locally and regionally abundant. It also encourages a closed canopy, which would stunt the growth and regeneration of tree seedlings and the growth and development of native shrubs and other herbaceous plants. The removal of trees favors grassland species, many of which are species of special concern, both locally and regionally. It would open many of the wooded areas to allow the natural regeneration of native trees. Before any cutting is done, site-specific floral and faunal surveys would be completed to assure the action is not affecting the habitat of any federal or state listed threatened or endangered species. In addition, best management practices would be applied to all sites to minimize the impact of tree removal on the park and its resources. This would include removing the trees in phases to minimize the effect on wildlife. It also includes cutting trees during seasons when breeding and migratory birds would not be affected.

NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose.

## COMMENTS

32

1 processing of visitors and, obviously, for the proper
2 storage and display of artifacts.
3 In order to satisfy this need, in my
a 4 opinion, there is no reason to relocate. Reconstruct
5 a new center at the existing visitor site. That's my
6 recommendation. That's my suggestion. There is no
7 need to disturb other historic property. And there
8 is no need to include food services, as plenty are
9 already available nearby.
b 10 Second, please don't remove the trees. This
11 disturbs natural habitat, in my opinion. And I really
c 12 don't think that the average visitor coming to the
13 park really gives a hoot about whether the trees were
14 there in 1863.
15 Finally, my third is with regard to the
16 cyclorama. Don't move it. Don't destroy it. Fix it.
17 Thank you.
18 MS. ANSTY: Thank you, Mr. Roulette.
19 John Murphy.
20 MR. MURPHY: Good afternoon. I am John
21 Murphy, a resident of the Borough of Gettysburg, part
22 of a vanishing breed, the taxpayers in Gettysburg.
23 I spoke the other night on the issue of the
24 core of the National Park. And I will make another
25 remark on that in a moment.

## RESPONSES

c NPS surveys and professional experience suggest that the great majority of visitors come to the park to learn about its history, and that once here, they hope to see a landscape that reflects the conditions present in 1863. NPS believes that removing non-historic woodlands and restoring historic woodlots and orchards would have a dramatic effect upon battlefield interpretation and help GNMP meet its fundamental purpose. Section 1.6.1, paragraph 2, states that "preserving the historic landscape of the battle is the fundamental purpose of the park." The 1995 Visitor Services Project, referenced in Section 3.2.2, pp. 182-183, of the GMP, established that 88 percent of those surveyed cited history and culture as the most important reasons they visited Gettysburg. Of the people surveyed, 96 percent toured the battlefield. The park interpretive rangers are frequently asked if the battlefield landscape looks like it did in 1863. The Visitor Services Project and experience of the park interpretive staff establishes that the park visitor has an interest in history, tours the battlefield, and wishes to see a landscape that resembles 1863 as nearly as possible.

33

But, for those who have not been to all of the meetings, it's been a long trail. It has been rancorous at times. I think we are learning how to communicate. There must be a better way to run this process. We are still learning, but let's keep working on it because I think it is a unique experience for Gettysburg. We must find a way to plan our own future.

I think we are seeing the baron system dying in Gettysburg if we do this. I think the National Park Service is learning how to go from a world of sole source procurement into actual competition, something that many agencies of the government did in 1987.

Alternatives. Like others, I feel there may be a middle alternative. There is a no action alternative, and there is the major alternative, Alternative C. I believe fixing up what you've got, rehabilitating and expanding is an alternative, possibly distributing some of the curatorial and archival facilities into new facilities that might be within the Borough of Gettysburg, up near the college, part of the college campus, research area. And you might consider phasing out the whole development over a broader period of time, from 5 to 20 years.

a

## John Murphy

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Based upon that public response, NPS released a Request for Proposals in December 1996, seeking a partner or partners to assist in the accomplishment of the DCP's preferred alternative. The RFP process resulted in the selection of a proposal for negotiation in November 1997, and a revised proposal in June 1998. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal.

## COMMENTS

34

b

1 Park core, I gave the other night. I won't
2 repeat it. But every park has a core. The core of
3 this park is the cemetery. Then the museum was added,
4 then the visitor center that we are in now. The three
5 became the core of Gettysburg Park. We are talking
6 about moving two-thirds of the core a mile and a half
7 to the east – a half mile to the east. And I believe
8 it will rip the heart out of the core. The easy
9 ambiance for the visitor, the visitor experience will
10 go away. You cannot easily flow from the museum to
11 the visitor center to the cemetery and on to the
12 battlefield and into the commercial zone, because it
13 is park policy you should keep commercialism out of
14 the zone – out of the core parks. It should be in a
15 commercial zone on the fringe of the park. That's
16 what we should be aiming for.
17 If we go to Alternative C, two-thirds of the
18 core will move a half mile to the east, and I believe
19 a new commercial zone will emerge right alongside.
20 Finally, I'd like to – I believe it would
21 be a disaster for the Borough of Gettysburg because it
22 is our main base. And I am speaking as the former
23 chairman of the borough council's finance committee
24 and I am also the treasurer of Main Street
25 Gettysburg. I'm speaking as an individual here today,

## RESPONSES

**b** The historic core area of the park is not composed of or dependent upon visitor use facilities. The historic core of the park has been identified within the draft document as that combination of unique and nationally significant resources that together make up the historic resource area. This area is composed of the contributing landscapes of the Major Battle Action Resource Area, the Soldiers' National Cemetery, and the Battlefield Commemorative Resource Area—all of which are the essence of Gettysburg NMP. The current Visitor and Cyclorama Centers have already sundered the historic core of the park. Relocating the visitor facilities from their present (and relatively recent) sites adjacent to the national cemetery would not adversely affect the historic core of the park. In fact, their relocation to a site outside of the Major Battle Action and Commemorative Resource Areas would enhance this historic park core. The site proposed for the new museum complex is outside of the historic park core and therefore would fulfill NPS mission goals and planning guidelines.

35

1 though.

2 As far as the flora and fauna issue — I

3 will close with that — when a management plan such as

4 we are now reviewing proposes to remove hundreds of

5 acres of woodlands and fails to acknowledge that this

6 action might have some kind of an effect on the fauna,

c 7 i.e. white-tailed deer or turtles, whatever, it lacks

8 credibility. The indigenous white-tailed deer's

9 preferred habitat is the woodland. Remove the habitat

10 and the deer will go somewhere else off the

11 battlefield. It is, in effect, an alternative to the

12 sole alternative approved in the 1994 EIS, that of

13 shooting the deer.

14 Also, the 1994 EIS is sadly out of touch

15 with the realities of the current deer management

16 program. To assert on Page 26 that it is, quote, not

17 necessary to discuss this issue just does not make

18 sense.

19 Thank you.

20 MS. ANSTY: Thank you, Mr. Murphy.

21 Tom Vossler.

22 MR. VOSSLER: I am Tom Vossler,

23 V-o-s-s-l-e-r. I speak today, as I have in the past,

24 as a concerned citizen and homeowner in Cumberland

25 Township.

## Tom Vossler

c The draft GMP/EIS evaluates the effect on the park's flora and fauna as a result of the alternatives. All four alternatives have environmental consequences that were considered and some species would benefit from the proposed actions while others would not. Chapter 3 of the draft and final GMP/EIS identifies what specific park resources, including flora and fauna, would be affected by the proposed actions (sections 3.2.9; 3.2.10; 3.2.11). Chapter 4 of the draft and final GMP/EIS evaluates each alternative and how the proposed actions would affect threatened and endangered species, flora, and fauna (4.3.2; 4.4.2; 4.5.2; 4.6.2; 4.7.2) and other natural resources. The population goal of the white-tailed deer management plan, 25 deer per forested square mile, would be maintained in all alternatives in this GMP/EIS.

COMMENTS

RESPONSES



1 I have also recently retired from 30 years'
2 service in the United States Army, the latter part of
3 which I spent managing a large federal historical
4 archive facility.
5 I want to emphasize at this point the views
6 that I am expressing here this afternoon are not
7 endorsed by any organization of which I am a member.
8 The Secretary of the Army would certainly disavow any
9 knowledge of my presence here.
10 The General Management Plan, which we have
11 been asked to comment on, provides an opportunity to
12 create an improved National Military Park and an
13 improved visitor center worthy of our American history
14 and our American heritage.
15 Based upon my experience, background, and
16 reading of the GMP document, I find that the GMP,
17 specifically Option C, and the building of a new
18 visitor center as currently proposed is what is needed
19 to adequately preserve and interpret the
20 aforementioned American history and American
21 heritage.
22 Additionally, my background, experience,
23 and service to the nation lend the qualifications for
24 me to objectively assess the leadership and the vision
25 of the senior person in charge of the Gettysburg

37

1 National Military Park, specifically Dr. John
2 Latschar. Having served in a similar position as Dr.
3 Latschar, faced with increased public usage of the
4 facility while supporting federal resources decrease,
5 I find that his leadership and vision are commendable
6 and encourage him individually and the staff who
7 authored the GMP collectively to stay the course and
8 get on with the improvements so desperately needed.
9 Thank you.
10 MS. ANSTY: Thank you, Mr. Vossler.
11 I'd like to call Betty Lee Frealing.
12 MS. FREALING: Good afternoon. My name is
13 Betty Lee Frealing, F-r-e-a-l-i-n-g.
14 First, I would like to know why the plaque
15 was removed from in front of the Brien House on the
16 Taneytown Road, 134. It's no longer there. I don't
17 know when it was removed, but it's gone.
18 And the next thing I would like to say, I
19 resent people thinking we do not know what is best for
20 our town. I have lived here for over 50 years, and I
21 feel that from the progress that I have seen, some of
22 it is good and some it is not so good. Now, the plan
23 that we have now, I cannot see anything good in it
24 except money for someone. I don't know who. And I
25 hope — what my hope is and my prayer, and with God's

a

## Betty Lee Frealing

a The Brian house is located on Hancock Avenue and the interpretive wayside exhibit for that structure remains.

# COMMENTS

38

1 help, that our town, our community come to be the
2 beautiful place that it used to be before the
3 confusion with this National Park planning.
4 Thank you.
5 MS. ANSTY: Thank you, Ms. Frealing.
6 I'd like to call Craig Stark.
7 MR. STARK: My name is Craig Stark,
8 S-t-a-r-k. I am with the Working Group at
9 Gettysburg.
10 And I feel that I have to start by saying
11 that some people have alluded to the process being
12 something that it isn't. What I mean by that is, with
13 all due respect, the attorney who stood up and said
14 that under administrative law process there had been
15 numerous hearings. This is the second hearing. And
16 it is a one-way communication where we are
17 communicating. Nothing that the park has proposed in
18 any of those workshops has been recorded or documented
19 in any way, shape or form. That's the fundamental
20 flaw in this public review process.
21 Quickly, I want to state that, contrary to
22 other comments that have been made here, that the
23 people that I am associated with truly are interested
24 in the preservation of the Gettysburg National
25 Military Park, its environment, and its historic

# RESPONSES

## Craig Stark

1 resources. The only hidden agendas that we have
2 seen so far have been economic. And those are the
3 forces that are really underlying and driving this.
4 I am asking that this public review of the
5 General Management Plan/Environmental Impact Statement
6 be suspended for the following reasons:
7 First and foremost, this morning I read in
8 the paper of a tremendous government surplus. I think
9 it would be appropriate that if this process be
10 suspended, I am certain that our federal legislators
11 would submit a request and see whether or not we can't
12 get private or public money to do this.
13 The second reason that I am asking for a
14 suspension is that the NPS has failed to identify the
15 programmatic development of this unit. The document
16 is flawed because the Department of the Interior is
a 17 developing a wildlife management program precedent
18 here and developing a public/private partnership
19 program. Nowhere in this document is the
20 programmatic approach identified or addressed in
21 any way, shape, or form.
22 The environmental program is absent two
23 particular things. Number one is, it does not discuss
24 any form of traditional farming. It does not in any
25 way, shape or form address traditional harvesting of

a The NPS does not believe that there is a need to complete a Programmatic EIS (PEIS) for wildlife management. Between 1989 and 1992 NPS explored the possibility of writing a PEIS for white-tailed deer. In February of 1992, the Chief of the Wildlife and Vegetation Division in the Washington Office released a statement concluding that writing a PEIS was premature at this time. He went on to say, "the Service does not 'in fact' nor by declaration have a program for management of white-tailed deer. Problems are not defined specifically enough at the park-level and there is an insufficient base of information to realistically assess alternative scenarios." At that time it was also recommended that Gettysburg NMP should begin its EIS as soon as possible and involve close coordination of park, regional, and national staffs. The goals and objectives for white-tailed deer management are unique to Gettysburg NMP and Eisenhower NHS.

The Record of Decision was approved for the Final White-tailed Deer Management Plan/Environmental Impact Statement (FWDMP/EIS) in June 1995. During the development of the plan, the public was given the opportunity to comment at public scoping and general public meetings and by mail. The approved goal of the plan was to maintain the deer density at Gettysburg NMP and Eisenhower NHS at 25 deer per square mile of forest.

b The Milton Hershey School Office of General Counsel provided the information to which you refer in a letter dated February 20, 1998. Here is the relevant portion of their response:

> . . . Mr. William H. Alexander is Chairman of the Board of Managers for the Milton Hershey School and Chairman of the Board of Directors of the Hershey Trust Company, the Pennsylvania banking corporation which serves as trustee for the Milton Hershey School Trust. Among the assets owned by the Milton Hershey School Trust is HERCO, Inc., a resort and entertainment company located and operating in Hershey, Pennsylvania.
>
> As you are aware, Mr. Alexander is professionally associated with the Wharton School of the University of Pennsylvania. Mr. Alexander advises me that the Wharton School was retained by the National Park Service to assist it in evaluating proposals for the proposed Visitor's Center at Gettysburg National Park. He further indicated that the

40

1 wildlife resources in any aspect, in a peripheral — I
2 am talking about the boundaries. Doctor, you know
3 what I am talking about.
4 The economic problems with this is that from
5 the very beginning, the underlying agenda has been
6 economic. And there have been far — there have been
7 the appearance of conflicts of interest. This goes
8 back to the beginning of the process when the NPS
9 selected William Alexander as a member of the
10 Evaluation Committee. At the time that he was
11 selected, he did have a relationship with Robert
12 Kinsley. This was revealed in the February 24th issue
13 of the Gettysburg Times. The Hershey Trust responded
14 with a letter that said that there was no conflict.
15 The content of that letter was inaccurate. Mr.
16 Kinsley's lawyer is a partner with the Hershey
17 Entertainment and Resort Company.
18 MS. ANSTY: Can you sum up, please.
19 MR. STARK: I think that I just have. I
20 will conclude with that.
21 MS. ANSTY: Thank you very much, Mr. Stark.
22 I'd like to call Bill Leonard.
23 MR. LEONARD: Thank you very much.
24 Again, I am very saddened by all of the
25 comments that people have made here this afternoon.

b

## Bill Leonard

National Park Service has been contacted by persons suggesting that Mr. Alexander's role with the Milton Hershey School Trust creates a conflict of interest with his, or indirectly with the Wharton School's consulting services to the National Park Service . . .

Based on information provided by HERCO, I have learned that HERCO owns land at the corner of Park Boulevard and Hershey Park Drive which previously was used and operated by HERCO as a commercial nursery. HERCO currently leases that land to Park Avenue Restaurant Court, LLC (PARC), which is in the process of constructing improvements at the site for several franchise restaurants it intends to operate. As part of that construction, PARC entered into a contract in September 1997 with Kinsley Construction for site work. HERCO is neither a party to this contract nor does it have any interest in the performance of the contract between PARC and Kinsley.

Based on information I have reviewed, it is apparent that no conflict of interest could arise under these facts. A conflict of interest generally is found if a person has an interest or relationship that could impair his or her independent judgment on behalf of an organization he or she represents. In this case, we have confirmed that the contract for services that allegedly creates the conflict for Mr. Alexander is between Kinsley Construction and PARC. Mr. Alexander has no interest in PARC and HERCO's relationship with PARC is merely that of landlord. The terms of HERCO's lease with PARC do not provide any financial benefit to HERCO if the construction of the land is completed within, at or above the contract amount. Thus, there is no interest arising out of Mr. Alexander's role with the Milton Hershey School Trust that could be seen as in conflict with his or the Wharton School's services for the National Park Service.

In addition, it is important to note that while HERCO is a wholly owned subsidiary of the Milton Hershey School Trust, it has a completely separate Board of Directors on which Mr. Alexander does not serve. Decisions made by the HERCO Board or its officers in the on-going management of the company are neither reviewed nor approved by Mr. Alexander or the other Board members that manage the Milton Hershey School Trust. Thus, even if this contract had been with HERCO, Mr. Alexander would have no reason to be informed by HERCO about the contract nor would he be expected to participate in any decision to retain Kinsley for any construction work that might be performed for HERCO. Again, no conflict would exist.

1 And the feeling that I have is — I have all this
2 written down and it just doesn't fit. The feeling
3 that I have is the mistrust. The feeling that I have
4 is that the information that has been provided isn't
5 accurate. And there's a lot of people that have
6 spoken and they say the document is just fine. And
7 there's a lot of people that have spoken and said that
8 the document is no good. Somehow, some way, I think
9 the National Park Service should realize that they are
10 the caretakers and the stewards of this park. They
11 are not the owners. And this document is going to
12 make a very, very big change. It is a big deal.

a

13 The information that I received was it took
14 a couple of years to do the document and then 60 days
15 for review, and then it will be implemented without
16 any other recourse. That doesn't exactly seem right
17 to me. I feel sure the National Park Service had
18 these meetings because they were required to. It was
19 mandated. It was mandated many, many years ago. And
20 maybe we should go back and think about why it was
21 mandated and then carry on from there.

22 Thank you.

23 MS. ANSTY: Thank you, Mr. Leonard. We are
24 going to take a five-minute break, and we'll be right
25 back after that.

a As outlined in Chapter 5, "Consultation and Coordination," NPS has provided numerous opportunities for public input and comment as draft plans were formulated. In 1995 NPS began considering alternatives for development of collections storage, museum and visitor center facilities. The DCP process included an Environmental Assessment with a formal scoping meeting, a formal 30-day review period for the scoping documents, 2 sets of subsequent public workshops, the release of a draft DCP/EA evaluating 4 alternatives and a 45-day public review period.

During the development of the draft GMP/EIS, four newsletters and an informational mailing on the proposed new museum complex were sent to 3,800 people on the park's mailing list. In response, NPS received more than 3,300 comments, including 960 individual letters and more than 2,800 responses to questionnaires or newsletters. Over the past 3 years, NPS has conducted 22 public meetings on these issues, including 6 presentations with question and answer sessions during the formal public comment period for the draft GMP/EIS. Over 500 public comments were received in response to the draft GMP/EIS.

| COMMENTS | RESPONSES |
|---|---|
| | **Peter Monahan** |

42

(Recess taken from 3:05 p.m. to 3:10 p.m.)

MS. ANSTY: We'd like to get started again. I'd like to call Peter Monahan to speak.

MR. MONAHAN: My name is Peter Monahan. I am a member of the Board of Directors of the Travel Council. I am a Friend of the Park. I am a member of Main Street Gettysburg and a resident of Gettysburg. All my comments will be from a personal standpoint.

Some people have talked about a hidden agenda. And as a concerned citizen, I feel the hidden agenda is within the GMP. And just to give some highlights, as I read through what the agenda is, it is to cut over 500 acres of trees, to kill deer, then cut some more trees, then kill some more deer, to close roads on the park and then charge a fee for shuttles, to tear down historic buildings, to destroy hallowed grounds that have been untouched, and to hold artifacts as hostage. I think this is a national disgrace. And I feel this plan should be rejected.

Thank you.

MS. ANSTY: Thank you, Mr. Monahan.

Alex Kessel.

MR. KESSEL: My name is Alex Kessel. That's K-e-s-s-e-l. I have about two and a half

43

1 pages I'd like to submit to the board for review.
2 Sorry, I was a little late today because of
3 all the traffic and I couldn't find a parking place.
4 And I didn't shave because I was too busy writing that
5 statement because I think it is so important for all
6 of us to be here and to make statements.
7 We are privileged to be here because we are
8 in the United States of America. I have spent 31-1/2
9 years in the United States Air Force. I am retired
10 now. I am enjoying those later years with the money
11 that the federal government is giving me. And I
12 certainly appreciate it.
13 Along that same line, I was born in West
14 Virginia. I was a full colonel in the West Virginia
15 Air National Guard. I have had positions of
16 responsibility. I have traveled all over this world.
17 And I am not going to let Gettysburg deteriorate
18 without making a statement.
19 I have been asked, as many of you in here, a
20 time or two to charge a stone wall for our country.
21 My little endeavor was a little invasion called Cuba
22 in 1962. I was to be the lead navigator in an
23 obsolete C-119. They had air-to-ground missiles that
24 were going to knock me down. My estimated time of
25 survival was one and a half minutes. Now, I still was

## Alex Kessel

COMMENTS

RESPONSES



1 going to go and so was my whole squadron. We worked
2 together as teams. And we studied and we thought it
3 all out. And thank God, our powers that be and higher
4 ups decided not to send us in, because I didn't think
5 we stood a chance.
6 Now, we stand a chance here today, people.
7 We can do something about it. We live in this
8 community. I have walked it every summer. I know it
9 probably better than any National Park person here. I
10 helped to mow grass here when I was a senior in high
11 school. I have been here forever. I am probably one
12 of the ghosts that these people see walking around on
13 the battlefield. And they're right. Because I had
14 charged to kill Adolph Hitler when I was a 12-year-old
15 boy three or four times with my group of boys. And we
16 may be some of those apparitions right up Little Round
17 Top and then Culp's Hill.
18 Now, with that said, let's get together and
19 do some work. And we have got a lot of work to do. I
20 am not here to criticize. I'm here to make good
21 comments and constructive criticism. And the people
22 that have said that prior to this are saying the right
23 words. Dr. Latschar has attempted to do his job as a
24 public servant. He isn't perfect. He's got the job
25 to do. Let's cooperate with him and get it done.

45

1 Now, I'd like to read my statement. The
2 following comments are submitted to you for attention
3 to the draft plan of the General Management Plan of
4 the Gettysburg National Park, Gettysburg,
5 Pennsylvania.
6 I also have a few sore subjects here.
a 7 Very little consideration has been given to
8 the future impact of traffic congestion on the major
9 arteries into Gettysburg in this plan. Many studies
10 have been completed in that regard by local and state
11 agencies.
12 I am also chairman on the Board of
13 Supervisors of Franklin Township. However, I am here
14 as a private citizen. I have made no comment as far
15 as that's concerned in an official capacity. I have
16 also spent about 10 or 12 years on the Planning
17 Commission in Franklin Township. I have chaired that
18 for about 8 years.
19 So, we have studied here locally. We have
20 got a lot of good people working here locally, and I
21 do resent anyone who says we don't try to cooperate
22 with all the officials in this neighborhood.
b 23 I do resent another point here. We, as a
24 municipality, have not been sent anything officially
25 on these documents. I think I have been receiving

a NPS certainly agrees that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide these comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

b A copy of the draft GMP/EIS was mailed to Franklin Township on August 14, 1998. Mr. Kessel later confirmed that the township's copy had been located.

# COMMENTS

46

1 some information through the Friends of the National
2 Park.
3 MS. ANSTY: Mr. Kessel, you're out of time.
4 But we all may be done and then you can come back and
5 speak at the end.
6 MR. KESSEL: I certainly would like to
7 reserve some time here because I have a lot more to
8 say.
9 MS. ANSTY: I think we'll have enough time
10 for you.
11 I'd like to call Janet Coleman.
12 MS. COLEMAN: Well, it looks like I am the
13 only one here without a page to read. And I am a
14 little late getting started in this. I only know what
15 I read in the paper.
16 My name is Janet Coleman, C-o-l-e-m-a-n, by
17 the way. I am a private citizen. I have lived here
18 all my life. Maybe you'd like the viewpoint of a
19 person who was born here. I lived through that awful
20 controversy of the Ottenstein Tower being built and
21 all the other things that the National Park has
22 gobbled up, as I look at it, Fantasyland and the Lee
23 Meade Inn way back when I was in high school, and all
24 these other places. They have so much land already,
25 do they need all of Adams County?

# RESPONSES

## Janet Coleman

## COMMENTS

47

1 I only live two miles from here. I am
2 wondering if it's not too long in the future they are
3 going to say, You have to move out, this is part of
4 the National Park. I think they would be better off
5 if they would take care of the National Park that they
6 already own.
7 And I am violently opposed to tearing down
8 buildings that are already here and they were only
9 built. This building we're standing in was only built
10 recently, in my view. And I don't know what condition
11 the other one is in. But if it's going to cost $12
12 million or some millions of dollars to tear these down
13 and more millions of dollars of our tax money to build
14 them back, to build something back Mr. Latschar wants,
15 in 25 years when there is no Mr. Latschar and there is
16 a different superintendent, are we going to need a new
17 one because the design does not suit him? No, no,
18 no. That's too much money to spend for somebody
19 else's idea.
20 MS. ANSTY: Thank you, Mrs. Coleman.
21 I'd like to call Dick Pearson — Peterson.
22 MR. PETERSON: That's okay. I have been
23 called everything else. Not a problem.
24 MS. ANSTY: I'm sorry.
25 MR. PETERSON: In fact, I have been called

## RESPONSES

### Dick Peterson

1 selfish. I have been called — told that I'm not
2 interested in the National Park because I own a
3 business here. And I would just like to say that I
4 think with some people — and this is part of the
5 divisiveness that I am going to address. Some
6 people would just like everybody to close here, just
7 close their doors, go away, have the park, have the
8 land, and then nobody would have anyplace to stay, no
9 places to eat. You know, everything could be done
10 here at the Park Service and done by the government,
11 who always takes good care of us. Right?
12 So, I ask, you know, is it selfish to own a
13 business adjacent to the battlefield? To some, I
14 guess it is. Is it selfish to want that business to
15 succeed? Is it selfish to want what is best for our
16 NPS and for those businesses and our community, the
17 Borough of Gettysburg? Is it selfish to worry about
18 our tax base and what will prove to be a certain
19 erosion? Are these selfish things? I ask you.
20 From the very beginning, the National Park
21 Service has never had communication with the
22 businesspeople. If John Latschar had come — and I am
23 not up taking off on John Latschar per se. But if the
24 National Park Service had come to us in the very
25 beginning and said, businesspeople, borough, friends,

1 all contingents, we need to get something done here
2 because we have got a problem, I think we would have
3 all supported Dr. Latschar in his endeavors. But he
4 has gone off in all these 22 meetings, all of the
5 answers to a lot of our questions have simply been
6 delayed. Well, we don't know that yet, we'll answer
7 next time. Now we are down to that very point in time
8 where these things should be answered and they are not
9 being answered at this meeting.
10 The other thing I would like to say is that
11 I still go back and say that the United States
12 Government should pay for this. The privatization
13 should not be a part of this. It never should have
14 been. Dr. Latschar has agreed with me in that area.
15 And I would like to enter this little piece
16 of paper into this record. In today's Philadelphia
17 Inquirer, at the Pentagon, $50 million has been
18 allocated for Viagra. That's right, $50 million for
19 Viagra for our retired servicemen. Give me a break.
20 We can afford $50 million for Viagra and we can't
21 afford $43 million for our national treasures?
22 Hey.
23 MS. ANSTY: Thank you, Mr. Peterson.
24 Eric Uberman.
25 MR. UBERMAN: U-b-e-r-m-a-n. The Borough of

## Eric Uberman

## COMMENTS

50

1 Gettysburg, the Gettysburg Area Retail Merchants'
2 Association, the Visitor and Convention Bureau, the
3 Chamber of Commerce of Gettysburg, the Gettysburg
4 Battlefield Preservation Association, the Editors of
5 the Civil War News, the Working Group, if you will, of
6 Gettysburg, your friends and neighbors who own
7 hundreds of businesses within two-fifths of a mile of
8 where we stand, your friends and neighbors who employ
9 thousands of people within this community, your
10 friends and neighbors who pay taxes to support the
11 schools, all of these people agree and all of these
12 groups agree that something should be done. These
13 groups have been working very hard. They have
14 attended meetings of the Park Service and they have
15 held their own meetings. But these groups look for
16 alternatives, but no alternatives are given.
17 Clearly, Alternatives B, C, and D at their
18 heart have the Kinsley proposal. There is no
a 19 alternative. And there is no change. So, if there is
20 to be any compromise, it can't be done. There is no
21 discussion.
22 So, antagonism comes from no choice.
23 Antagonism comes from what is perceived by this entire
24 community as a predetermined visitor center at the
25 very heart of the General Management Plan. And, yes,

## RESPONSES

a Development Concept Plans are tools that NPS uses to solve facility concerns. During the draft Development Concept Plan/Environmental Assessment, NPS developed and reviewed with the public a reasonable range of four alternatives for solving the facility concerns at Gettysburg NMP. The public had an opportunity to review and comment upon alternatives, and the criteria that NPS proposed for evaluation of the site and selection of a proposal. After a proposal was selected for negotiation, NPS gave the public a chance to comment on the specifics of that proposal. During this NEPA process, the public had many opportunities to comment on alternatives, criteria, specifics of the proposal, and other issues.

In April 1997, while the RFP process was underway, NPS began the planning for a new GMP/EIS to replace the park's outdated 1982 GMP. Because the RFP was underway, NPS announced that it would defer consideration of new facilities as a part of the draft GMP/EIS until proposals were received and evaluated. The proposal selected for negotiation in response to the RFP would be incorporated into the draft GMP/EIS. Working with the public, NPS established goals for the GMP (pgs. 7-9). Those are:

- The land and resources of Gettysburg NMP are protected, rehabilitated and maintained.
- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

51

1 it does make all of these people antagonists to say
2 that they are against the General Management Plan in
3 its present form simply because they believe that they
4 are not given any alternative to the Kinsley visitor
5 center.
6 Like many of you, I have attended all of the
7 Park Service workshops. And we have also not only
8 read the General Management Plan, but we have read the
9 various supporting documents, all of which are equally
10 as thick. And I think that most of you, probably all
11 of you, who had attended one of the workshops in
12 particular that had to do with the environmental
13 impact in terms of the economy would agree that the
14 Thomas Martin report was flawed, almost admittedly
15 flawed by Thomas Martin himself at that meeting when
16 he admitted that there was absolutely no primary
17 research for his report. And his report is the basis
18 for the Kinsley proposal which is the heart of the
19 General Management Plan.
20 Thank you.
21 MS. ANSTY: Thank you, Mr. Uberman.
22 I'd like to call Mark Gruin.
23 MR. GRUIN: I feel like I am back in
24 school. My name is Mark Gruin. My name has been
25 mispronounced for decades. It takes me way back.

## Mark Gruin

## COMMENTS

52

1 For now, I'd like to comment briefly on this
2 proposed visitor center, museum, and commercial
3 services complex.
4 Before I even start, I think it is important
5 to say that improved interpretive and collection
6 storage facilities is a sound objective. There is
7 very little dissent that these things can be done
8 better. And ten years from now, they can be done
9 better than they do them today. However, the proposed
10 complex, the visitor center, museum and commercial
11 storage complex, includes two very significant problem
12 areas, as I see it.
13 Its commercial elements — first of all,
14 its commercial elements are contrary to the spirit of
a 15 the park. They compete directly and unfairly with
16 existing local small businesses providing the same
17 services. And further, its proposed location removes
18 the vital pedestrian traffic from the core commercial
19 district and captures it within the heart of the park
20 as opposed to on the fringes.
21 This core commercial district has emerged in
22 concert with the development of the park. Its growth
23 has been in response to the rising numbers of visitors
24 to Gettysburg and the needs of those visitors for
25 food, lodging, entertainment, information, education,

## RESPONSES

a The book and museum store, licensed battlefield guide tour center and limited food service incorporated within the proposed new museum complex are necessary and appropriate visitor services. NPS management policies permit necessary and appropriate visitor services within parks if they meet visitor interpretive and use needs, enhance the use and enjoyment of the park without resulting in impairment of park values, and can be located where the least impact on park resources and values will occur. In this case, the provision of an expanded book and museum store, limited food service and a center for tours led by licensed battlefield guides meet NPS management policies for appropriate and necessary services. NPS would also provide for-fee interpretive programs in the center, including the electric map, a cyclorama program, and a film.

NPS evaluated the impact of the book and museum store, limited food service, licensed battlefield guide tour center and for-fee interpretive programs, along with the other changes proposed in the GMP alternatives, on the local tourist economy. The analysis found that there would be positive impacts on local businesses. Although NPS estimated that more dollars would be captured by the proposed facilities than are captured in the existing visitor center facilities, local businesses located outside of the park boundaries would also benefit. For example, in Alternative C, although in-park expenditures would rise from $3,233,775 in 1996 to $8,730,700 in 2007, out-of-park or expenditures in the community would also rise, from $112,850,385 in 1996 to $137,129,300, or 21.5%, in 2007. In other words, Alternative C would generate almost $30 million dollars in additional visitor expenditures and more than $24 million dollars of that would go to local commercial businesses outside of the park's boundaries.

1 souvenirs and gift items. Currently, this commercial
2 district includes at least 104 small to medium size
3 businesses, all operating within two-fifths of a mile
4 of the current visitor center and National Cemetery, a
5 comfortable walk. This pedestrian traffic is vital to
6 the core of the commercial district and any attempts
7 to relocate the visitor complex and manipulate visitor
8 movement patterns to eliminate this pedestrian traffic
9 would have serious negative impacts.
10 Much has been made of the reduction in size
11 and scope of the proposed visitor center complex.
12 While these have made some difference, they have not
13 even come close to addressing the real problems, which
14 are the relocation of the visitor center complex
15 itself and the continued inclusion of commercial
16 elements that duplicate and compete with those in the
17 community.
18 Unfortunately, semantics regarding the
19 commercial elements of the visitor center and
20 commercial services facilities have been used to sway
21 opinion and obscure facts. The movie theater that
22 seats 225 people is, in fact, being proposed.
23 A 300-seat eating facility is being proposed. And a
24 significant expansion of the current book and gift
25 shop is being proposed. These represent new and, in

## COMMENTS

54

1 the case of the book shop, expanded commercial
2 enterprises that would be built on some of the last
3 untouched land on the battlefield and will compete
4 directly with small business enterprises in the area.
5 In the policy known as the National Park
6 Service Management Policies, under the heading
7 of "Concessions Management," subheaded "Concessions
8 Planning," the National Park Service clearly indicates
9 its preference for a much different approach to
b 10 location of these services by saying, quote, If
11 adequate facilities exist or can feasibly be developed
12 by private enterprise to serve park visitors' needs
13 for commercial services outside park boundaries, such
14 facilities will not be expanded or developed within
15 the parks.
16 While it is understood that a semantic
17 argument again can be made that what was proposed is
18 not a concession, but a partnership on private land,
19 the fact is that, in reality, proposed services do
20 meet the test. If they were a concession, they would
21 represent the development of facilities to serve the
22 park visitors' needs within park boundaries while
23 adequate facilities already exist outside.
24 In addition, the proposal for development
25 calls for the facility to eventually be turned over to

## RESPONSES

**b** The proposed new collections storage, museum and visitor center facilities would not commercialize Gettysburg National Military Park. These proposed new facilities would provide necessary and appropriate incidental services that enhance the visitor experience and are entirely consistent with NPS policies, regulations and statutes. The existing visitor facilities at the park include: collections storage, a museum, and a visitor center; the Electric Map program; the cyclorama gallery; a conventional theater in which NPS presents an educational film; a licensed battlefield guide tour center, and the park book and museum store. The new facility would continue these uses, providing enough space to make these operations more efficient. The new facility would also include limited food service. The park's existing facilities can no longer provide adequate orientation and interpretation for its visitors, or adequate protection for its collections, archives and the cyclorama painting. The present facilities are visible as modern intrusions on the battlefield's historic setting. The proposed new facilities would allow NPS to provide superior orientation and interpretation, adequate protection for its collections, archives and the cyclorama painting, and would remove modern intrusions from the historic core of the battlefield.

55

1 the Park Service —

2 MS. ANSTY: Wrap up your comments.

3 MR. GRUIN: — at which time it becomes a

4 concession.

5 Taking all this into consideration, it seems

6 reasonable that the process followed here is not

7 consistent with the Park Service's own policies and

8 has resulted in a badly flawed plan.

9 I would ask that the Park Service consider

10 this major element of the plan be removed altogether

11 and to allow for unbiased examination of alternatives

12 for the creation of a sound and viable General

13 Management Plan.

14 Thanks.

15 MS. ANSTY: Thank you.

16 Wes Ayre.

17 MR. AYRE: Good day. The prospect of the

18 United States Army on Viagra is something which

19 Saddam will be somewhat interested in.

20 My name is Wes Ayre, A-y-r-e, of Gettysburg.

21 I have read the draft General Management

22 Plan in its entirety as well as several of the

23 documents related to it and offer the following

24 conclusions.

a 25 Number 1. The plan is inadequate as a

## Wes Ayre

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- Visitors understand and appreciate the significant events associated with the Gettysburg Campaign and its impact on the development of the nation.
- Visitors safely enjoy high-quality and accessible educational experiences.
- Public and private entities understand the park's mission and act cooperatively to protect and interpret the park and other resources related to the Gettysburg Campaign and its commemoration.

As a part of the process, NPS held public scoping meetings, workshops and focus group meetings; prepared and presented new mapping and resource work to explain the 1863 battle landscape and the changes it had undergone; and evaluated 5 preliminary concepts. Because of public comment, a sixth combined concept was developed. This combined concept eventually became NPS' preferred alternative. NPS considers that the environmental review procedures followed in this matter, including consideration of public comment as a part of the process, comply with NEPA.

56

1 formal response to the obligations of the National
2 Park Service to present publicly a comprehensive and
3 thoughtful analysis of all alternatives, particularly
4 on the subject of the visitor center and museum
5 facilities.

b

6 Number 2. The plan calls for actions that
7 are, at the very least, inconsistent with both the
8 letter and, more importantly, the spirit of HR-3248,
9 better known as the so-called boundary legislation of
10 1990. This legislation only eight short years ago was
11 advanced in the Congress and to the general public,
12 including the Gettysburg community, as the clear
13 framework by and through which the historic lands
14 surrounding us would forever be protected and
15 preserved, the meaning of which terms seemed at the
16 time to be clear and beyond misunderstanding.
17 The draft Management Plan now seeks to
18 exploit subtleties in the language of that legislation
19 in ways that profoundly diminish its integrity and its
20 authority.
21 Number 3. The plan fails to acknowledge the
22 full and proper responsibilities of the National Park
23 Service to work cooperatively in substantial and truly
24 meaningful ways with the Borough of Gettysburg, the
25 surrounding townships, and both the resident and

b On August 17th, 1990, an act to revise the boundary of Gettysburg National Military Park was signed into law. This legislation was adopted because of a congressional concern that key resources related to the 1863 Battle of Gettysburg were not being preserved and protected. Public Law 101-377 provided for the first time a clearly defined boundary for the park, and it provided positive incentives to encourage conservation of the encompassing Gettysburg Battlefield Historic District.

While the comment is unclear as to the specific actions the reviewer feels are inconsistent, Section 1.8.4 of the draft GMP/EIS indicates that it is based on Public Law 101-377. The draft GMP/EIS also calls for review of the park's land protection plan and land protection strategies as a result of implementing the management prescriptions in Section 2.7.1. The result of this prescription would be that, "the park's boundary and land acquisition strategy is sufficient to protect the nationally significant qualities of the park.". Although no new congressional boundary legislation is required, a few administrative changes would be required to correct boundary errors, add back significant federally owned parcels and include the Wills House in the park boundary. These anticipated administrative changes are listed in section 2.7.1 of the draft GMP/EIS. NPS believes that these actions strengthen the legislated boundary and would help preserve the nationally significant features of the Gettysburg Battlefield.

1 business communities they are in to serve mutual and
2 otherwise legitimate goals. Indeed, at its core, the
3 plan constitutes a very serious step in the opposite
4 direction, a step which has created and is likely to
5 foster a climate of mistrust, antagonism, and conflict
6 that will not serve the greater good.
7 Number 4. While purporting to serve
8 primarily the interests of visitors to the park, the
9 plan will, in fact, accomplish just the opposite.
10 Instead, the only interests that are truly served are
11 those of the Park Service administration, a small
12 group of private commercial enterprises accorded
13 preference, and the Friends of the National Parks at
14 Gettysburg, a special interest group —
15 MS. ANSTY: Can you sum up, please.
16 MR. AYRE: — that while providing valuable
17 financial support to a number of worthwhile endeavors
18 has garnered for itself a position of influence with
19 the park administration that is beginning to come at
20 the expense of other voices that also deserve to be
21 heard.
22 MS. ANSTY: Thank you, Mr. Ayre.
23 MR. AYRE: And my summary for these and
24 other beliefs I will submit in greater written
25 detail. But I call upon the National Park Service to

## COMMENTS



1 undertake a comprehensive revision of this draft plan
2 in a manner so as to properly resolve its
3 inadequacies and abuses.
4 MS. ANSTY: Thank you, Mr. Ayre.
5 MR. AYRE: You are welcome.
6 MS. ANSTY: I'd like to call Mrs. Bobbie
7 Platt.
8 MS. PLATT: I am Bobbie Platt, a resident of
9 Adams County. I would like to emphasize that I am
10 speaking as a private citizen, not as a member of the
11 Park Advisory Commission.
12 There were many cries Thursday night about
13 the rights of private citizens to be heard. I am a
14 private citizen. I speak now as a private citizen. I
15 write as a private citizen.
16 I will support the park when I believe it is
17 proper to do so, and I will oppose it when I believe I
18 should.
19 I support the General Management Plan as
20 developed. There have been some well thought out
21 statements presented at these meetings, but
22 unfortunately, there has also been a great deal of
23 vitriol as well. And I have great admiration for all
24 of those seated at the front table who have had to
25 endure these very personal attacks. I write and

## RESPONSES

### Bobbie Platt

1 speak in defense of this park, the plan for its
2 future and, yes, its administration.
3 However, an editorial in the Sunday,
4 September 27 issue of the Harrisburg Patriot News
5 states the matter far more eloquently than I can. I
6 would like to enter it into the public record.
7 Here is a portion of that editorial:
8 "As Superintendent of the National Military Park, John
9 A. Latschar is responsible for some of the most
10 hallowed ground in America.
11 "We rightly expect that he will nurture
12 and preserve this invaluable resource so that visitors
13 today and for generations to come will be able to get
14 a feel for the epic battle that was fought there.
15 "And we expect him to fulfill his
16 responsibilities to us and posterity even as the
17 federal government has largely turned its back on this
18 and the rest of the nation's historic shrines and
19 natural treasures.
20 "While we find it absolutely shameful that
21 the government has failed to provide a responsible
22 level of funding year after year to Gettysburg and
23 other national parks, Latschar has worked hard, even
24 brilliantly, to develop a plan using private and
25 borrowed funds to address most of the problems

1 confronting the Gettysburg battlefield.

2 "It is an ambitious plan, as indeed the

3 challenge requires, and as such it is not without

4 its critics. But it strikes us that the critics

5 either do not have the best interests of the

6 long-term preservation of this historic shrine at

7 heart or have unjustifiable fears, largely related

8 to loss of business.

9 "Nevertheless, Latschar's plan, if carried

10 out, is going to make a visit to the Gettysburg

11 Battlefield a richer, more rewarding and pleasanter

12 experience than is possible today. That can only make

13 it a more attractive destination, thereby attracting

14 more people, possibly for longer stays, a development

15 that can only benefit the business interests of

16 Gettysburg.

17 "Instead of opposing the plan, local

18 merchants would be well advised to work with Latschar

19 and the NPS to devise ways to enhance the lure of

20 downtown Gettysburg and provide convenient means for

21 visitors to get there from the proposed $39 million

22 visitor center.

23 "Absolutely no one gains if the value of the

24 Gettysburg experience is diminished through failure to

25 preserve the artifacts, documents, photographs,

1 monuments and, most of all, the battlefield itself
2 from the long-term effects of neglect.
3 "Everyone gains if Gettysburg is rescued
4 from the compound damage of years of inadequate
5 funding, deferred maintenance, and a legacy of
6 ill-advised decisions.
7 "Somebody had to offer a way out of the
8 battlefield's long-term downward spiral in the absence
9 of Congress providing the necessary resources. That
10 somebody is Latschar, and everyone who cares about
11 Gettysburg would do well to lend their support."
12 In summary, I have one final statement.
13 Finally, I would note that some speakers have
14 mentioned their personal ties to this battlefield. I
15 too have a very personal connection with this place.
16 Beginning in 1982, my husband and I worked as
17 volunteers in the park. During part of that time, my
18 husband assisted Larry Eckert in the museum. Chuck
19 died in 1992 and his ashes are now on this
20 battlefield. This park may be the site of a family
21 home, but it is also my husband's grave. And you can
22 be assured that I will fight with all the strength I
23 have to see that this park is preserved and protected
24 by those who act in the interest of the battlefield,
25 not themselves.

62

1 MS. ANSTY: Thank you, Mrs. Platt.

2 I am going to open the floor up for people

3 who want to make additional comments. But I would

4 like to invite Mr. Kessel to come back and finish his

5 comments, because he clearly had a little more to talk

6 about.

7 MR. KESSEL: I certainly appreciate this

8 opportunity and thank you very much. I want to

9 stress that this is all intended, again, to work with

10 the battlefield.

11 I am a visionary thinker. And my very first

12 statement here is that very little consideration has

13 been given to the future impact of traffic congestion

14 on the major arteries into Gettysburg. Many studies

15 have been completed in this regard by local and state

16 agencies which should/could be at your disposal.

17 These impact studies have indicated that within the

a 18 next 20 years, vehicular traffic will quadruple in

19 this area of the United States. For us not to

20 consider this in a plan which is determined for the

21 future of the entire Gettysburg National Park is

22 unthinkable. I therefore recommend that further

23 traffic studies be conducted before we determine the

24 exact location of the visitor center, which would cost

25 in the neighborhood of $40 million, regardless of

## Alex Kessel

a NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as this study is conducted over the next several years. In the meantime, NPS believes that the selected location for the proposed museum complex is in the best interests of the park's resources and visitors. The exact location of the museum complex would not be expected to influence significantly the recommendations of regional transportation studies.

1 where the funding is derived.

2 However, the road/highway structure through

3 Gettysburg and the surrounding communities played a

4 major role in the convergence of the two great armies

5 who fought here in 1863. The infrastructure and

6 convergence of these highways should also be preserved

7 for future historic — wait a minute now — areas.

8 Traffic congestion, I believe, will be the major

9 problem in Gettysburg if we do not address it. I

10 propose that we consider — or reconsider a bypass of

11 Route 30 around Gettysburg and perhaps a scenic

12 beltway some distance and yet within easy range or

13 access to the Gettysburg National Park's avenues.

14 Perhaps these access points could have user-friendly

15 information centers, rest facilities and directional

16 guides to the area's points of interest and commercial

17 facilities. This would eliminate through traffic,

18 i.e. trucks, that do not want to enter Gettysburg,

19 which at present have no other choice but to mingle

20 with tourist traffic. If it does quadruple, or even

21 just doubles, within the next 10 years, how will you

22 address this congestion? To prolong visionary

23 thinking in this area will only be detrimental to all

24 concerned.

25 In my opinion, concentration of visitor

educational facilities into areas proposed by the National Park Service will only add to this confusion. Although I find the basic plan sound with a few exceptions, which I will address further in the letter, I recommend reconsideration of the location of the proposed visitor center.

It seems to me that by withdrawing tourist reception areas from the battlefield and placing them along access routes as I propose would preserve the historic image of the highway structure within the Borough of Gettysburg itself, which is essential to the conveying the historic movements of the armies to future generations.

We, as citizens of this community, should have addressed this problem a long time ago. The Butterfield farm was purchased by the National Park Service with what I thought at that time was a sound plan for future generations to interpret what has happened here. That plan, or at least my understanding of it, directed visitors to the battlefield areas in proper sequence, i.e. the first day through the final days of the battle. I think this should be considered again as the proper educational approach that we want for future generations that come here. The present plan does

not do that.

The second issue that I would like to address is the fate of what I consider, and I thought educated historians considered also, a rare treasure that was placed among us by the Rosensteel family. I refer to the Electric Map. I see nothing in the grand scheme of the General Management Plan that addresses its future.

The third issue that perhaps is going to be a sore subject for many people here, we have not addressed properly, in my opinion, is the preservation of those $350,000 — or 350,000 historic artifacts. Many artifacts. How many artifacts do we need, how many rifles, how many cannons and so forth? I recommend that you finish the inventory and catalog all items as addressed in the plan; number two, that you determine the minimum number that is required by the Gettysburg National Park Service; you determine by cooperating with other Civil War National Parks how many of these artifacts they could use to convey their message; four, that you redistribute the excess that the National Park Service does not really need to those other National Civil War Parks; and five, that you recommend, and I recommend, that the excess number of rifles and so forth, that they be offered to the

## COMMENTS

66

1 public and proceeds received applied to the upkeep and
2 maintenance of Gettysburg National Park.
3 Along that line, if these artifacts are
4 deteriorating as described in the draft of the
5 Management Plan, gross negligence has taken place.
6 Who can we, as citizens of this country, hold
7 accountable? Is it you? If it is, you have sorely
8 neglected your duties to the people of the United
9 States.
10 As for the condition of the cyclorama
11 painting, I ask the question, who is responsible?
12 Is it you? If so, you have again neglected your
13 duties to the people of the United States.
14 As for the financial plan for the new
15 visitor center as proposed by Mr. Kinsley and the
16 National Park Service, I ask you why the secrecy? As
17 so many others have said and we heard comments here
b 18 today and at previous meetings, with something so
19 important as this, secrecy would be reason enough to
20 reject the plan. Therefore, I recommend full
21 disclosure of all financial details to the public to
22 prevent loss of respect and integrity for those who
23 have conceived the plan.
24 In the past, there has been much
25 interaction between the local community and the

## RESPONSES

**b** The Gettysburg National Battlefield Museum Foundation released the details of their proposal to the public on June 15, 1998. That proposal (with modifications) is the one included in the draft GMP/EIS. Information regarding the revisions to the original proposal was included in newsletters mailed to the public and in public meetings prior to the publication of the draft GMP/EIS. Additional data is included in the economic assessment prepared by the Office of Thomas Martin for the draft GMP/EIS; this report became available to the public when the draft GMP/EIS was distributed to the public for comments. You are correct that other proposers have not released financial information to the public. Under the Federal Freedom of Information Act, NPS is not permitted under certain circumstances to make proprietary information public, including financial information submitted by proposers, without consulting with the proposers, and in certain instances obtaining their permission. Three of the proposers objected to the release of proprietary information contained in their proposals. NPS determined that under FOIA, it was obligated to withhold most of the information, including proprietary financial information.

# COMMENTS

67

1 Gettysburg National Park, which has been very
2 beneficial to all of us concerned. It is my opinion
3 that secret studies and plans such as the financial
4 obligations involved in the new visitor center and
5 some of the plans for the preservation of historic
6 districts within the Gettysburg/Adams County area will
7 only destroy the confidence that we have in the
8 Gettysburg National Park and some of the organizations
9 that profess to have our national interest at heart.
10 I don't really think we want this.
11 In summary, I think the General Management
12 Plan is sound, with the exception of the proposed
13 location of the visitor center and lack of traffic
14 study impact. The joint venture between Mr. Kinsley
15 and the National Park is brilliantly conceived.
16 However, as stated above, secrecy has greatly
17 undermined efforts thus far in the minds of many local
18 agencies and governments. This secrecy should cease.
19 The artifacts should be immediately cared for in the
20 manner which will preserve them for future
21 generations. If funding has been a problem to insure
22 preservation of these historic documents, then we are
23 all at fault for not demanding that funds be
24 appropriated from federal resources. We should take
25 this in its proper context and address the issue to

# RESPONSES

68

1 our government officials for immediate funding to
2 preserve these national treasures.
3 Thank you.
4 MS. ANSTY: Thank you, Mr. Kessel.
5 I'd like to welcome anybody who has not
6 spoken or who has spoken and feels as if they need
7 more time.
8 Mr. Stark.
9 MR. STARK: Craig Stark. And following the
10 last comments in regards to the secrecy involved in
11 the planning of this, I think it goes back to the
12 economics.
13 Simultaneously with the park developing a
14 new General Management Plan, Cumberland Township has
15 commissioned a comprehensive plan that is being done.
16 And it was not disclosed to the Cumberland Township
17 supervisors that the consultant that they had hired
18 had a preexisting relationship with Dr. Latschar at
19 his last post in Steamtown when they represented a
20 municipality up there as part of a comprehensive plan
21 in conjunction with the National Park's commercial
22 endeavor of Steamtown.
23 There is a subcontractor who has been hired,
a 24 and he did not disclose to his clients, Cumberland
25 Township, that he was working for the park. He's

## Craig Stark

a Orth-Rogers & Associates, Inc., of Philadelphia, is a well-known and well-respected transportation and traffic engineering and consulting firm. The NPS selected this firm partly because of previous work they had done in the area, including work for Adams County. Due to past work in the area, Orth-Rogers was able to perform the analyses required by the NPS more efficiently and effectively than a firm which had never worked in the area before. Subsequent to NPS' contract with Orth-Rogers, Cumberland Township also hired the firm for traffic consulting work pertaining to the township's comprehensive plan revisions.

1 their traffic consultant. And these kind of omissions
2 I think undermine the integrity of what you're trying
3 to accomplish here. I think that this goes back to
4 the industrial tourism interest. And what is actually
5 in play here is an attempt to relocate the main
6 attraction at Gettysburg. And once you do that, then
7 you are free to develop the new corridors. And I
8 think that this goes back to the relationship between
9 Mr. Kinsley and the Hershey Entertainment and Resort
10 Company's parent company, the Hershey Trust, Mr.
11 William Alexander.
12 When this information about Mr. Kinsley and
13 Mr. Alexander was published in the paper, one William
14 S. Jackson, a Friend of the National Park through his
15 affiliation with the Civil War Roundtable in Hershey,
16 called down here to the editor of the Gettysburg
17 Times. He was able to persuade B. J. Small never to
18 print the story that involved Mr. Kinsley's lawyer,
19 Jeffrey Lobach, being a partner with Hershey in a
20 restaurant that was just opened up there,
21 another precedent-setting deal, whereby, up there,
22 instead of the federal government owning the land,
23 it is the orphanage.
24 So, what happened was, Alexander and the
25 trust enabled Mr. Lobach, Mr. Kinsley's attorney for

70

1 this new project, to establish a new restaurant
2 there on Hershey land. Unprecedented.
3 This is, I think, an indicator of what is
4 actually happening down here in an attempt to relocate
5 this tourist attraction and then develop the 97
6 corridor.
7 Thank you.
8 MS. ANSTY: Thank you, Mr. Stark.
9 Could you just identify yourself again.
10 MR. SHULTZ: Dean Shultz. I did want to
11 mention one thing under interpretation. People
12 worldwide recognize the name Gettysburg as the place
13 where Abraham Lincoln gave one of the greatest
14 speeches known to man, The Gettysburg Address. Why
15 can we not make it one of the Gettysburg National
16 Military Park management goals the business to secure
17 a copy of The Gettysburg Address for permanent exhibit
18 at Gettysburg?
19 We could also consider further that the
20 present visitor center be reduced in size and remain
a 21 as a place to honor and interpenetrate Abraham Lincoln
22 and The Gettysburg Address. It is only a few steps
23 from where he stood on November 19, 1863.
24 And two further comments. Prior to any
25 development of the visitor center complex, I would

## Dean Shultz

a The NPS considered the rehabilitation of the current visitor center as one of the alternatives in the 1996 *Draft Development Concept Plan/Environmental Assessment for Collections Storage, Visitor and Museum Facilities*, which was made available for a 45-day public review period in April 1996. However, the current visitor center is located on land that was central to the Battle of Gettysburg and is a contemporary intrusion upon the battlefield's historic setting. The NPS' desire to restore the historic setting of the battlefield, coupled with the extremely high costs of rehabilitation of the current building, led NPS to select a new facility in a more suitable location as its preferred alternative.

b

1 encourage that a detailed traffic study be made of
2 the area. This could be made in conjunction with
3 PennDOT, local municipalities, the Park Service, and
4 so forth.
5 And finally, to protect and preserve the
6 battlefield, the National Park Service must develop a
7 way to preserve the significant historical areas
8 adjacent to and visible from the park, especially the
9 Baltimore Pike and Taneytown Road corridor. Many of
10 the proposed goals can be instrumented in the future,
11 but the future is now if you wish to preserve the
12 land.
13 Thank you.
14 MS. ANSTY: Thank you, Mr. Shultz.
15 Does anybody else have any comments?
16 Come on down, Mr. Caba.
17 MR. CABA: Recently, in a Hanover newspaper
18 article, there was comment concerning a request for
19 funds over the last two years. And I thought that for
20 the public record, this, of course, should be
21 corrected.
22 I'd like to read for the public record from
23 the United States Senate testimony, the 24th of
24 February, 1998. This is on Page 33, and it is Line
25 11.

b NPS concurs that regional traffic solutions are appropriate and needed. The draft GMP/EIS (page 205) speaks to the need for a Comprehensive Road Improvement Study for the region. NPS has testified to the Commonwealth of Pennsylvania's Department of Transportation (PennDOT) regarding the need for this work. PennDOT is now in the process of advertising for an engineering firm to provide comprehensive traffic and transportation studies for the Gettysburg area. The project will include all of the communities in the affected area of the park. The study will recommend both short and long term solutions, including traffic signal and intersection improvements, minor widenings, capacity improvements and congestion relief measures. NPS would continue to cooperate with PennDOT and the local municipalities as these plans are developed.

72

1 "Senator Thomas: You are welcome. Thank
2 you. Well, Dennis," referring to the deputy director
3 of the National Park Service, "it seems like this has
4 gone for you. You walked about difficulty with the
5 artifacts and so on. This has been going on for quite
6 a few years. I would have to tell you that the Park
7 Service has not demonstrated a lot of planning and
8 foresight in this situation. You have not asked for
9 any money for Gettysburg for six years. It is kind
10 of interesting that this thing has deteriorated to
11 the point that it has without more efforts on the part
12 of the Park Service. Is that fair? I am sure you
13 will say it will not be."
14 Line Number 21. "Mr. Galvin: Well, it is,
15 Mr. Chairman, if you take Gettysburg in isolation."
16 The point being that it was six years in which
17 requests for funds were not made. And that, of
18 course, was pulled out by Senator Thomas.
19 Thank you.
20 MS. ANSTY: Thank you. At this time, would
21 anybody else like to comment on the record?
22 MR. GRUIN: Just one more. I'll apologize
23 in advance for another dry policy discussion.
24 My name is Mark Gruin, again, G-r-u-i-n.
25 MS. ANSTY: Thank you.

## Craig Caba

1 Mr. GRUIN: Very briefly, this is on the
2 General Management Plan itself, the process used. The
3 General Management Plans are intended to provide broad
4 direction and guidance for all the aspects of the
5 park's operation and development over a period of 15
6 to 20 years. Once a general management plan has been
7 approved, more specific management plans for
8 individual elements of the park's operations are then
9 to be developed to flesh out and pursue these broad
10 directional guidelines that have been established.
a 11 These more specific plans can and do include
12 commercial services plans, development concept plans,
13 resource management plans. This is not just an
14 opinion. This comes directly from a document known as
15 National Park Service Directives Order Number 2,
16 called "Park Planning," which was effective May 27 of
17 1998.
18 In Section 3.3.1.2. it says, "General
19 Management Planning will constitute the first phase of
20 tiered planning and decision-making. It will focus on
21 why the park was established and what resource
22 conditions and visitor experience should be achieved
23 over time."
24 Importantly — and it goes on to say in the
25 following section, 3.3.1.6, "The analysis of the

## Mark Gruin

a Inclusion of the proposed museum complex in the draft GMP/EIS does not violate NPS policy. The Collections Storage, Museum and Visitor Center draft DCP/EA was prepared under the existing Gettysburg NMP 1982 GMP. Development Concept Plans are a tool NPS can use to solve facilities concerns. The findings of the draft DCP were brought into the new draft GMP/EIS when it became clear that the public interest could best be served by doing so.

1 General Management Plan alternatives will meet the
2 program standards for NPS implementation of the
3 National Environmental Policy Act, NEPA, and related
4 legislation, including the Historic Preservation
5 Act."
6 I want to bring out that this reference to
7 NEPA is especially important. Someone touched on it
8 briefly earlier. One fundamental parameter of
9 NEPA holds that plans cannot be used to support
10 decisions previously made. According to NEPA, such an
11 approach is not only wrong, but actually illegal. It
12 appears that this is exactly what is taking place with
13 this draft GMP as it relates to the visitor center
14 complex. The General Management Plan has been
15 developed not to allow for the examination of
16 alternatives through development of the visitor
17 center, museum and commercial services facilities, but
18 the support of previously made decisions to pursue
19 this development in a way that has already been
20 decided upon.
21 The draft General Management Plan has put
22 the proverbial cart before the horse here creating a
23 development plan for a commercial services complex
24 with an artificially narrow planning scope, then
25 deciding it was time to update the General Management

a (cont.)

a (cont.)

Plan, then doing so saying that the visitor center complex has already been decided upon and is not open for discussion.

I would submit that this manipulation puts the entire GMP plan and its findings and recommendations at serious risk. By inserting this previously arrived at decision regarding the visitor center development into the GMP, any thorough and reasonable examination of the visitor center development alternatives has been effectively short-circuited. For this reason alone, it would seem reasonable to ask the park administration to go back to the drawing board and pursue this in the proper order. Update the GMP first without the proposed visitor center, create the appropriate and necessary guidelines for operation management and development without the bias of the visitor center complex lurking over the whole process, and then and only then complete a new and unbiased development concept plan for visitor facilities.

Thanks.

MS. ANSTY: Thank you. Again, I am going to call for additional speakers. We do have 15 more minutes if anybody would like to comment on the GMP.

(No response.)

| COMMENTS | RESPONSES |
|---|---|



MS. ANSTY: If nobody else wants to comment, I will close the meeting early if nobody wants to comment. Okay. Thank you very much for attending.

(The hearing was concluded at 4:05 p.m.)

1 CERTIFICATION

2

3

4 I hereby certify that the proceedings are
5 contained fully and accurately in the notes taken by
6 me on the hearing of the above cause, and that this
7 copy is a correct transcript of the same.

8

9

10 Judith A. Greenholt, RPR
Official Court Reporter

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NOTARIAL SEAL
JUDITH A. GREENHOLT, NOTARY PUBLIC
HANOVER BORO., YORK COUNTY
MY COMMISSION EXPIRES MARCH 10 2001
Member, Pennsylvania Association of Notaries

**Petition Memo:**

Petition statement — a request of the Director (Stanton) to suspend the present sixty (60) day review period of the ***draft GMP***, pending a review of an ethics related issue in the said proposal.

Basis.
*draft GMP*, page 294 — August 1998 — "Park staff have also served on several boards and committees that have a direct relationship to the GMP, including, Main Street Gettysburg, Gettysburg/Adams County Area Chamber of Commerce, Gettysburg Retail Merchants Association, the Friends of the National Park (advisory only), and the Gettysburg NMP Advisory Commission (as federal officer)."

Ethics problem is in the above admission statement; it is contrary to NPS regulations & supportive memos.

NPS 32, Chapter 2, page 7:
"Service staff shall NOT serve on association boards of directors, even in an *ex-officio* capacity. To do so is a violation of an ethics statue which carries criminal penalties." The regulations were revised in June 1995.

See also Director Memorandum dated June 21, 1988:
page 2. "Park Service employee who is serving on an association board, in any capacity, resign from that position."

Memorandum dated August 9, 1993: same as NPS 32 content.
"The purpose of this memorandum, therefore, is to ensure that each superintendent is aware of the statue that pertains to this issue."

Original publishing of "CONFLICTS OF INTEREST" ethics was in NPS 32 in 1977. There is NOTHING new about this ethics issue; it is 21 years old.

Note: 1.) The specific board/commission, which the present superintendent is involved in with the published draft GMP, has notations to show his purpose; however other staff members do *not* have the same.

2.) Identified NPS staff on boards hold ranking *administrative positions*; they are not the "little guys" employed at the Park, who may have been historical zealots and simply carried away with a love of the Civil War.

3.) A formative MODEL plan for public-private partnerships MUST be above reproach and ethical at its beginning.

## Petition - Concerned Citizens of Gettysburg

a "Cooperating Associations" are private nonprofit corporations established under state law that support the education, scientific, historical, and interpretive activities of the NPS in a variety of ways, under the provisions of formal agreements with the park or NPS. The NPS' cooperating association guidelines prohibit NPS employees from serving in any capacity on Cooperating Association Boards of Directors. However, NPS employees are encouraged to attend Board meetings in order to offer advice concerning the relationships between the association and the Service.

There are two such associations at Gettysburg NMP. Eastern National operates the park's bookstores and interpretive fee programs under memorandums of agreement with the NPS. The Friends of the National Parks at Gettysburg engages in cooperative activities with the park, to include fundraising, under a memorandum of agreement with the NPS. There are no NPS employees serving in any capacity upon the Boards of Directors of either association. Consequently, there is no violation of NPS policy, as the petition alleged.

NPS employees are also encouraged to participate in the activities of local communities, organizations, and civic groups, in order to enhance communication and coordination with park activities, as long as there is no financial conflict of interest associated with such activities.

## PETITION

September 11, 1998

To Director Stanton
National Park Service
Washington, D.C.

This is a public petition to respectfully request the Director to suspend the present sixty (60) day review and comment period, pertaining to the *Draft General Management Plan and Environmental Impact Statement* for the Gettysburg National Military Park, pending a review of an "ethics issue" related to said proposal.

The Director's guidance and intervention is sought regarding NPS administrative "staff serving on association boards of directors, even in an ex-officio capacity." (Source: *Cooperating Association Guideline — NPS 32, Chapter 2, page 7.*) The attached papers appear to be contrary, in our humble opinion, to the published regulations and policy further outlined in supportive *Director's Memorandums* dated June 21, 1988 and August 9, 1993. It would appear from these documents that every reasonable attempt was made to inform regional directors and park superintendents that "violation of an ethics statute, which carries criminal penalties for an infraction, should immediately cease." The previous Directors deserve the public's thanks for their thoughtfulness and thoroughness in distributing the *Memorandums*. This matter at GNMP, however, requires review to safeguard and maintain the public's trust, especially during the formative stages of a model for new public-private partnerships.

a

It is with regret that this issue is placed in front of you, Director Stanton, but no alternative was known. Your prompt consideration to remedy this matter would be greatly appreciated. The review period began on August 14 and concludes October 17, 1998.

Sincerely, Angela Rosenstiel Eckert

Stephen R. Matthews

Paul S. Witt

Berry Stell

Beverly H. Stanton

## United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
200 Chestnut Street
Philadelphia, PA 19106-2878

IN REPLY REFER TO:

(NER-GETT)

October 13, 1998

Honorable William F. Goodling
House of Representatives
Washington, D.C. 20515

Dear Mr. Goodling:

I am pleased to respond to your letter of September 22, 1998, to Ms. Kitty Roberts, Office of Legislative and Congressional Affairs, National Park Service, on behalf of your constituents, the "Concerned Citizens" of Gettysburg .

The petition requested that the Director of the National Park Service suspend the public review period for the "Draft" General Management Plan/Environmental Impact Statement for Gettysburg National Military Park due to alleged violations of NPS-32, "Cooperating Association Guidelines."

I appreciate your concern for this issue and the following information relates to this issue:

> In March 1998, the Director approved a new Cooperating Association Guideline, Director's Order #32 (DO-32). For your convenience, I have enclosed a copy of the new DO-32, which supersedes and replaces the Cooperating Association Guidelines (NPS-32) and other instructional memoranda that were attached to the petition;
>
> DO-32 defines "Cooperating Associations" as private nonprofit corporations established under State law, which support the educational, scientific, historical, and interpretive activities of the National Park Service in a variety of ways, under the provisions of formal agreements with the Service; and
>
> DO-32 prohibits National Park Service's employees from serving in any capacity on Cooperating Association Boards of Directors, as either voting or non-voting (ex-officio) members of the Board. However, National Park Service's employees may attend Board meetings in order to offer advice concerning the relationship of the association to the Service.

As you know, there are two Cooperating Associations at Gettysburg National Military Park. Eastern National operates the Park's bookstores and Interpretive Fee Programs under a Memorandum of Agreement with the National Park Service. The Friends of the National Parks at Gettysburg engages in cooperative activities with the Park, to include fundraising, under a Memorandum of Agreement with the National Park Service. I can assure you that there are no National Park Service's employees serving in any capacity upon the Boards of Directors of either Association. Consequently, there are no violations of National Park Service's policy, as alleged by the Concerned Citizens.

## PETITION

**To – Director Stanton**
**National Perk Service**
**1849 C Street N.W.**
**Washington, D.C. 20240**

**From — Concerned Citizens**
**Post Office Box 4247**
**Gettysburg, PA. 17325**

**Listing of Petitioners/Signers and addresses:**

Angela Rosensteel Eckert
85 Country Club Lane
Gettysburg, PA 17325

Dick Peterson
213 Steinwehr Ave.
Gettysburg, PA 17325

Eric Uberman
1370 Piccard Drive, Suite 200
Rockville, Md. 20850

Representative Stephen Maitland,
91st District - 412 South Office Bld.
Harrisburg, PA. 17120-2020

Ms. Tammy Myers
18 Seminary Ave.
Gettysburg, PA 17325

Paul S. Witt
380 Steinwehr Ave.
Gettysburg, Pa 17325

John Murphy
1002 Long Lane
Gettysburg, PA 17325

Capt. Barry E. Kunkel
193 Longstreet Dr. (Lake Heritage)
Gettysburg, PA 17325

Craig Stark
Box 4247
Gettysburg, PA 17325

Dr. Beverly Stanton
3355 Baltimore Pike
Gettysburg, PA 17325

*page 2.*

Bob Monahan
1859 Emmittsburg Road
Gettysburg, PA 17325

Ms. Catherine Renaud
2705 Lisa Kim
Nochport, Ohio 43830

Mr. & Mrs. Ken Boardman
706 Highland Ave.
Gettysburg, Pa 17325

In order to enhance communication and cooperation between the National Park Service and local communities and organizations, National Park Service's employees are encouraged to participate in the activities of such organizations, as long as there is no financial conflict of interest associated with such activities. I am sure that you will agree that the active participation of the Superintendent and his staff with such organizations in the Gettysburg-Adams County area is to the benefit of both the community and the Park.

I hope that this information satisfies your constituent's concerns. As always, I appreciate your interest in Gettysburg National Military Park and the National Park Service.

Sincerely,

Marie Rust
Northeast Regional Director

Enclosure: As stated.

## Summary

**Two administrative staff members of the NPS currently serve on "BOARDS". It is respectfully requested that this issue be reviewed and the 60 day review period of the Gettysburg Draft GMP be suspended during that time.**

*I. Draft GMP*: Page 67, section 2.6.4 — Partnership and Cooperative Actions: listing of Main Street Gettysburg, Inc. as "existing partnership."

Page 298, Chapter 5 Consultation & Coordination, section 5.2.1-- NPS Planning Team at GNMP, lists on line 3 "Deborah Darden, Planner & Team Leader."

List of Main Street, Inc. Board of Directors — Note Secretary "Debbie Darden."

Main Street, Inc. Board Meeting Minutes Nov. 18, 1997 — "Submitted by Deborah A. Darden, Secretary, Dec. 3, 1997." NOTE position held on Main Street and active participation.

Main Street, Inc. January 13, 1998 Board Meeting Minutes-- Note the early morning "call to order" and "adjourned" time and signature of the secretary, "Deborah A. Darden," dated "1/30/98," indicating participation on a cooperating association's board of directors. It should also be noted that the traditional role of a secretary of any organization focuses on communications and information and is regarded as a vital position. Secretaries know almost everything.

At a recent meeting the secretary announced she would not serve another term due to a *new* regulation that may be linked to a conflict of interest policy.

*II. Draft GMP:* Page 298, section 5.2.1, lists on line 12 "John McKenna, Assistant Superintendent."

Page 2 of the updated Gettysburg-Adams County Chamber of Commerce lists under "Directors" — "John McKenna, Gettysburg National Military Park."

| COMMENTS | RESPONSES |
|---|---|
| **Questions:**<br><br>An important aspect of this development is — "Does this board/ staff ethics issue evolve into ***a management pattern*** *by* Gettysburg NPS to influence "useable" non-profits?"<br><br>1.) Was there basic compliance with existing NPS policy, regulation, and memorandum detailing pertinent information regarding "boards" and the ethics statute?<br><br>2.) If there was any GNMP question pertaining to "boards", why was the Bureau Ethics Counselor not contacted, as suggested on the August 9, 1993 Memo? If they were contacted, did they issue a written exemption for these individuals? What was the legal basis for the exemptions/waiver?<br><br>3.) What time frame does the NPS employ for ethics training and education at Gettysburg? Are updated classes attended by the staff and what records indicate favorable performance?<br><br>4.) What federal funds and support have been given to Main Street, Inc.? Has there been a significant increase in the past three years? What future projects is Main Street linked intimately to the NPS upon acceptance of the proposed GMP and new Visitors Center? Does the NPS review Main Street projects, such as the roadside tablets? Has there been any formal or informal communication on office space or small additional museum exhibits in the town that could also serve to advertise the NPS' new Visitors Center complex?<br><br>5.) What future funds and support will be offered by the NPS in what the Draft GMP calls "expanded partnerships?" Could this also include more NPS staff on non-profit's boards?<br><br>6.) What position has Main Street, Inc. taken, regarding the proposed Draft GMP, which includes the controversial proposed new Visitor's Center and Museum facility? What position has the "Chamber of Commerce" taken regarding these issues? What is the definition of "*organizational neutralization*", according the NPS manual?<br>(Retail Merchants Association and the Borough have thus far rejected the proposed GMP No NPS staff serves on either board.)<br><br>7.) Was there any influence exerted on Main Street, Inc. by having a NPS administrative staff member on the board? As a cooperating association, did the GNMP provide a working copy of the NPS regulations and policies to Main Street's Board of Directors? (The Superintendent's role calls for providing information to non-profits.)<br><br>8.) If other local "partnership" associations were examined over a five year period, would there be other potential or actual problems of a similar character?<br><br>9.) Why was the *practice* of administrative staff members on "boards" not stopped by the Superintendent over the years? | |

| COMMENTS | RESPONSES |
| --- | --- |
| 10.) Was it a *local practice* approved, or encouraged, or tolerated by the Superintendent as a management "tool"? | |
| 11.) What role has the Northeast Regional Director played in supervision, especially in light of the recent Congressional Hearing, where "mistakes" were acknowledged by Director Kennedy? | |
| 12.) Has the Northeast Regional Director made herself available to the public over the past two years at Gettysburg to learn of their concerns, make unannounced inspections, observe public meetings as a member of the assembly, and meet with *all associations* and interested citizens? | |
| 13.) What ethics education, standards of conduct programs, and general training has the Northeast Regional Director implimented to help correct and eliminate questionable management procedures and practices at local parks? | |
| 14.) How much time does the Regional Director or designee spend visiting the parks under their command during a year? | |

## Amendment to the Summary.

Minutes to Cumberland Township Comprehensive Plan Meeting, April 7, 1998

The members of the "Task Force" included representatives of the "National Park Service — John Latschar or Debbi Darden" (Latschar is Superintendent; Darden is a Planner for identification purposes.)

Although the GNMP is the greatest single land owner in this Adams County township, the question of influence exerted by the NPS perhaps should be examined as an *ethics safety procedure*. On page 2 Mr. Bucovetsky lists issues, the second being "Dominance of the GNMP and ENHS ..."

Since the proposed new Visitors Center, a private-public partnership Dr. Latschar intends to embrace, will be in this area, many questions arise.

1.) To what extent is the NPS presence on the Task Force representative of the Parks interest?
2.) Does the NPS serve on this Task Force for the Township Comprehensive Plan in an *informational and non-voting capacity*?
3.) To what extent does the Township's Comprehensive Plan *hinge* on the current NPS update of their General Management Plan?
4.) What influence or impact will the proposed new Visitors Center have on the *traffic and road system*?
5.) What influence or impact will the NPS exert on *road construction to the proposed new Visitors Center* with relation to Cumberland Township?
6.) What influence or impact will the NPS exert on Cumberland Township, regarding *sewage and water* with development of the proposed new Visitors Center?
7.) What additional *zoning* will Cumberland Township contend with, in reference to the proposed Visitor Center and adjacent lands for development?
8.) Is it appropriate for Dr. Latschar or his designee to have *voting powers* on a local township task force, forming a comprehensive plan?
9.) At what point is the NPS representing the interest or impacting on the outcome of their *private partner* in the development of the proposed Visitors Center? If the proposed new Visitors Center was to be constructed on Park land, would the NPS have such a presence on the local Task Force of Cumberland Township for the Comprehensive Plan?
10.) What previous "Task Force" involvement has the NPS participated in over the past twenty-five years with Cumberland Township?

# PETITION

September 11, 1998

To Director Stanton
National Park Service
Washington, D.C.

This is a public petition to respectfully request the Director to suspend the present sixty (60) day review and comment period, pertaining to the *Draft General Management Plan and Environmental Impact Statement* for the Gettysburg National Military Park, pending a review of an "ethics issue" related to said proposal.

The Director's guidance and intervention is sought regarding NPS administrative "staff serving on association boards of directors, even in an ex-officio capacity." (Source: *Cooperating Association Guideline — NPS 32, Chapter 2, page 7.*) The attached papers appear to be contrary, in our humble opinion, to the published regulations and policy further outlined in supportive *Director's Memorandums* dated June 21, 1988 and August 9, 1993. It would appear from these documents that every reasonable attempt was made to inform regional directors and park superintendents that "violation of an ethics statute, which carries criminal penalties for an infraction, should immediately cease." The previous Directors deserve the public's thanks for their thoughtfulness and thoroughness in distributing the *Memorandums*. This matter at GNMP, however, requires review to safeguard and maintain the public's trust, especially during the formative stages of a model for new public-private partnerships.

It is with regret that this issue is placed in front of you, Director Stanton, but no alternative was known. Your prompt consideration to remedy this matter would be greatly appreciated. The review period began on August 14 and concludes October 17, 1998.

Sincerely,

| | | | |
|---|---|---|---|
| [illegible] | 2705 Lisa Kim Ln, | Washington OH | 43130 |
| Stephanie Scupio | 1001 Oakland Blvd. | Cambridge OH | 43725 |
| Sabrina Hopkinson | 58314 Mitchell Rd. | Cambridge, OH | 43725 |
| Faith D. Nichols | 8026 Cousin Rd. | Cumberland OH | 43732 |
| Cindy Gaylord | 485 Rhodes Ave. | Zanesville OH | 43701 |
| Shelley Riggs | 6660 Swing-a-long | Nedpart OH | 43830 |
| Patricia Mungan | 388 Bailey St. | Zanesville, OH | 43701 |
| Conny Lock | 8340 Buck Delaware Rd. | Beckport, OH | 43787 |
| CATHY LEONARD | 6893 W SR 37 | MALTA, OH | 43758 |

*Draft*
General Management Plan
and Environmental Impact Statement

GETTYSBURG
NATIONAL MILITARY PARK
PENNSYLVANIA

August 1998

Evelyn Bryman Rt 2, Box 141, Decatur, TN 37322
Robert H. Bryman Rt. 2, Box 141 Decatur, Tn. 37322
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Virgil Cooley 6828 Old Holland Hwy. Kenwood, TN 37882
Peggy W. Yates 8533 N. Hwy 73, Townsend Tn. 37882
Nella Fields PO Box 4621 Cleveland, Tn. 37320
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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.